A.2 Part A/
Interim Status

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. ILD001744572 ~~ILD020958278~~

I. NAME OF INSTALLATION: TRIEM STEEL & PROCESSING, INC.

II. INSTALLATION MAILING ADDRESS: PO BOX 578 CHICAGO HTS, IL 60411

III. LOCATION OF INSTALLATION: 26TH & STATE STREET CHICAGO HTS, IL 60411

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED
F ILD001744572 1	A	800625

000029

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

CITY OR TOWN | ST. | ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

CITY OR TOWN | ST. | ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
LEONARD C TRIEM	312-757-6060

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: LEONARD C TRIEM

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO. ILD001744572 ~~ILD020958278~~

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

JUN 25 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

S														T/A	C
W	1	C	D	0	0	1	7	4	4	5	7	2	2		1
1	2												13		15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K062					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Leonard C. Triem	Leonard C. Triem, President	6-23-80

3/12/81

Please print or type with ELITE type (12 characters per inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REPORT

5 MAR 1981

PLEASE PLACE LABEL IN THIS SPACE

I. TYPE OF HAZARDOUS WASTE REPORT

PART A: GENERATOR ANNUAL REPORT
THIS REPORT IS FOR THE YEAR ENDING DEC. 31, 19__

PART B: FACILITY ANNUAL REPORT
THIS REPORT FOR YEAR ENDING DEC. 31, 1980

PART C: UNMANIFESTED WASTE REPORT
THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.) __-__-19__

INSTRUCTIONS:- You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above—left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).

II. INSTALLATION'S EPA I.D. NUMBER

F ILD020958278 1   ILD 00154 4572

III. NAME OF INSTALLATION

TRIEM STEEL & PROCESSING, INC.

IV. INSTALLATION MAILING ADDRESS

	STREET OR P.O. BOX		
3	PO BOX 578		
	CITY OR TOWN	ST.	ZIP CODE
4	CHICAGO HEIGHTS	IL	60411

V. LOCATION OF INSTALLATION

	STREET OR ROUTE NUMBER		
5	26TH & STATE STREET		
	CITY OR TOWN	ST.	ZIP CODE
6	CHICAGO HEIGHTS	IL	60411

VI. INSTALLATION CONTACT

	NAME (last and first)	PHONE NO. (area code & no.)
2	WASSEROTT CLAYTON	219-696-7866

VII. TRANSPORTATION SERVICES USED (for Part A reports only)

List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)

A. COST ESTIMATE FOR FACILITY CLOSURE	B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)
$ ___,___,___	$ ___,___,___

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. PRINT OR TYPE NAME	B. SIGNATURE	C. DATE SIGNED
Clayton Wasserott	Clayton Wasserott	2-24-81

EPA Form 8700-13 (4-80)

Please print or type with ELITE type (12 characters/inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

U.S. ENVIRONMENTAL PROTECTION AGENCY
FACILITY REPORT – PARTS B & C
(Collected under the authority of Section 3004 of RCRA.)

FOR OFFICIAL USE ONLY (Items 1 & 2)
1. DATE RECEIVED: 3 19
2. RECEIVED BY:

XVI. TYPE OF REPORT (enter an "X"): ☒ PART B ☐ PART C

XVII. FACILITY'S EPA I.D. NO.: G ILD020958278 (VA) C

XVIII. GENERATOR'S EPA I.D. NO.: ILD020958278

XIX. GENERATOR NAME (specify): Triem Steel & Processing, Inc.

XX. GENERATOR ADDRESS (street or P.O. box, city, state, & zip code): P.O. Box 578
26th & State St.
Chicago Heights, IL 60411

XXI. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. EPA HAZARDOUS WASTE NUMBER (see instructions)	C. HANDLING METHOD (enter code)	D. AMOUNT OF WASTE	UNIT OF MEASURE (enter code)
1	Spent pickle liquor from steel finishing operation	K062	T01	4560000	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XXII. COMMENTS (enter information by line number – see instructions)

RECEIVED
MAR - 5 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

EPA Form 8700-13B (5-80)

BILLING CODE 6560-01-C

P4816528611

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0310450005-- Cook County
Triem Steel & Processing, Inc.
ILD001744572
RCRA - Permits

May 6, 1988

Triem Steel & Processing, Inc.
26th & State Street
Chicago Heights, Illinois 60411

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:mab/1203j/1204j/

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

ase print or type in the unshaded areas only
ll—in areas are spaced for elite type, i.e., 12 acters/inch).

Form Approved OMB No. 158-R0175

638

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD002955078 (ILD001744572)

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

ILD002955078

TRIEM STEEL & PROCESSING, INC.
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
PO BOX 578
CHICAGO HTS. IL 60411

26TH & STATE STREET
CHICAGO HTS. IL 60411

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.?** (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.?** (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.?** (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes?** (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area?** (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area?** (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: TRIEM STEEL & PROCESSING INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 TRIEM LEONARD, PRESIDENT	312 757 6060

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 PO BOX 578	4 CHICAGO HTS	IL	60411

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 26TH & STATE STREET	COOK

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 CHICAGO HTS	IL	60411	

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CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3441 (specify) STEEL PROCESSOR & SERVICE CENTER	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: LEONARD TRIEM

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)

P (specify)

D. PHONE (area code & no.): A 312 757 6060

E. STREET OR P.O. BOX: PO BOX 578

F. CITY OR TOWN: CHICAGO HEIGHTS

G. STATE: IL

H. ZIP CODE: 60411

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N NA	P NA
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
U NA	NA (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
R APPLIED FOR	NA (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

JOBBERS OF STEEL MILL PRODUCTS, INCLUDING STORAGE, SHEARING, ROLLER LEVELING, CUTTING COILS TO LENGTH AND PICKLING. WE PURCHASE STEEL FROM STEEL MILLS AND SELL TO MANUFACTURERS AND FABRICATORS. WE ALSO PROCESS STEEL OWNED BY APPROXIMATELY 225 INDUSTRIES IN THE MIDDLE WEST AND STATE OF ILLINOIS WHO CONSTRUCT FARM MACHINERY, HEAVY EXCAVATING EQUIPMENT, AUTO MANUFACTURING, HOME APPLIANCES AND NUMEROUS OTHER ITEMS MADE FROM STEEL, WHICH MUST FIRST BE TREATED BY OUR SERVICE CENTER AND PROCESSING SYSTEM.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
LEONARD C. TRIEM, PRESIDENT	Leonard C. Triem	11-13-80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I L D 0 2 0 9 5 8 2 7 8 | T/A: | C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 | YR. 47 | MO. 02 | DAY 01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP | T/A | C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	T01	1,500	U		7				
					8				
3					9				
4					10				

NOV 13 1980

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

SPENT PICKLE LIQUOR IS DUMPED IN A TANK SUBMERGED UNDERGROUND; NEUTRALIZER IS DUMPED ALONG WITH THIS INTERMITTENTLY; CLEAR WATER FOLLOWS THIS FOR ABLUTION AND TO CLEAN OUT THE LINES AND THE FIRST NEUTRALIZER TANK. THIS RUNS INTO THE BOILER ROOM WHERE AN ADDITIONAL IN-LINE NEUTRALIZATION WILL OCCUR. IT CONTINUES TO OUR #1 HOLDING LAGOON WHERE IT WILL BE HELD AT A PH AS CLOSE TO NEUTRAL AS POSSIBLE AND WILL BE RELEASED IN A NEUTRAL STAGE INTO A MUCH LARGER SECOND HOLDING LAGOON FOR EVAPORATION. BOTH OF THESE LAGOONS HAVE A SOLID, LIMESTONE, BEDROCK BOTTOM AND 12" WIDE CONCRETE WALLS ANCHORED WITH 1" REINFORCING BARS TO THE BEDROCK BOTTOM AND ARE LINED WITH A DOUBLE APPLICATION OF COAL TAR EPOXY WHICH IS 100% LEAK PROOF.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

558

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY		
S 1	L D 0 2 0 9 5 8 2 7 8	T/A	C	
1 - 13		14	15	
W	DUP		2	DUP
1 2 - 13		14	15	23 - 26

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 28 / 29 / 30 / 31	
1	K 0 6 2	3,000,000	P	T 0 1	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
	23 - 26	27 - 35	36	27 - 28 / 29 / 30 / 31	

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F	I	L	D	0	2	0	9	5	8	2	7	8		6
1	2											13	14	15

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*						LONGITUDE *(degrees, minutes, & seconds)*					
4	1	2	9	1	8	8	7	3	7	2	5
65	66	67	68	69	71	72	74	75	76	77	79

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
LEONARD C. TRIEM, PRESIDENT	Leonard C. Triem	11-13-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

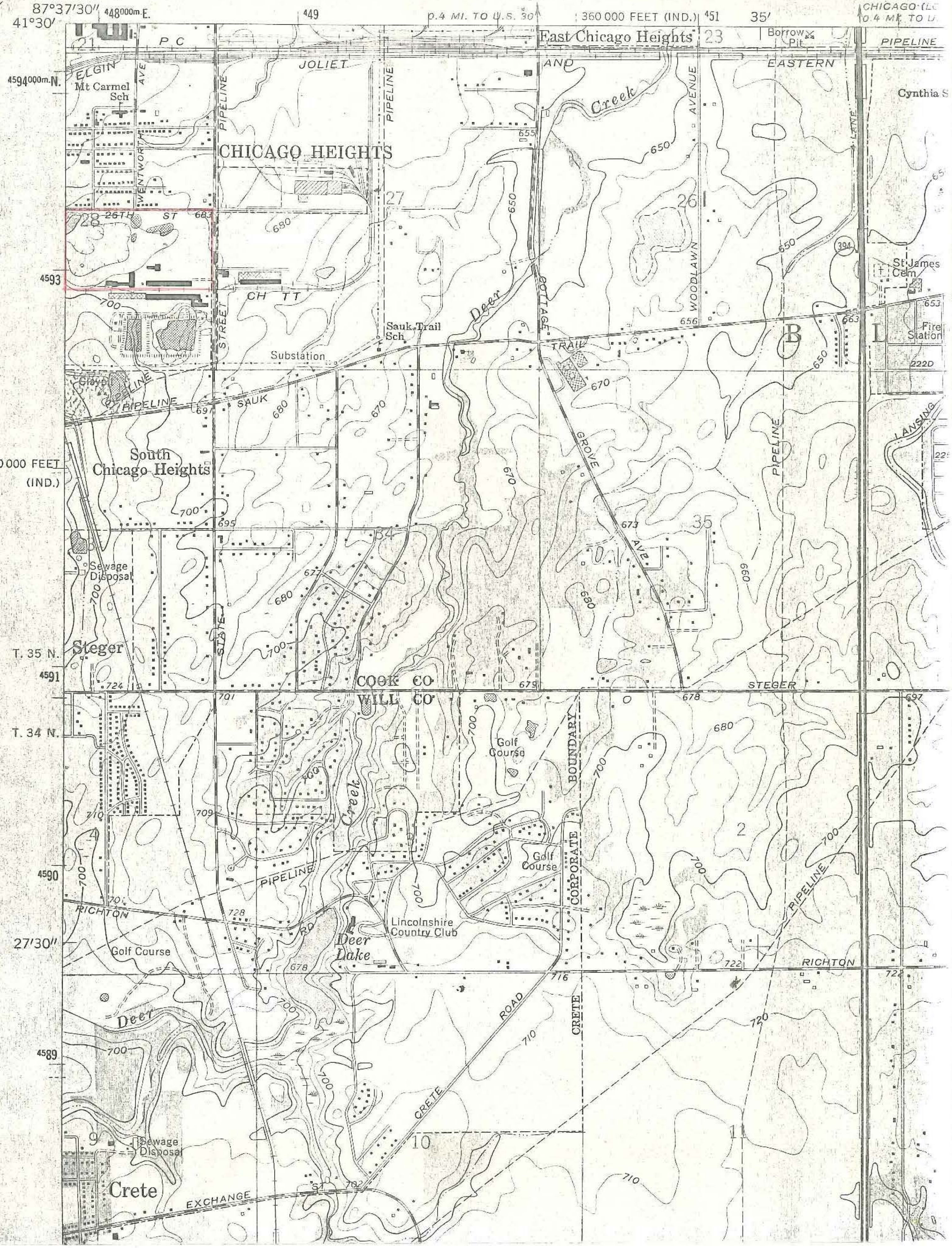
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
LEONARD C. TRIEM, PRESIDENT	Leonard C. Triem	11-13-80

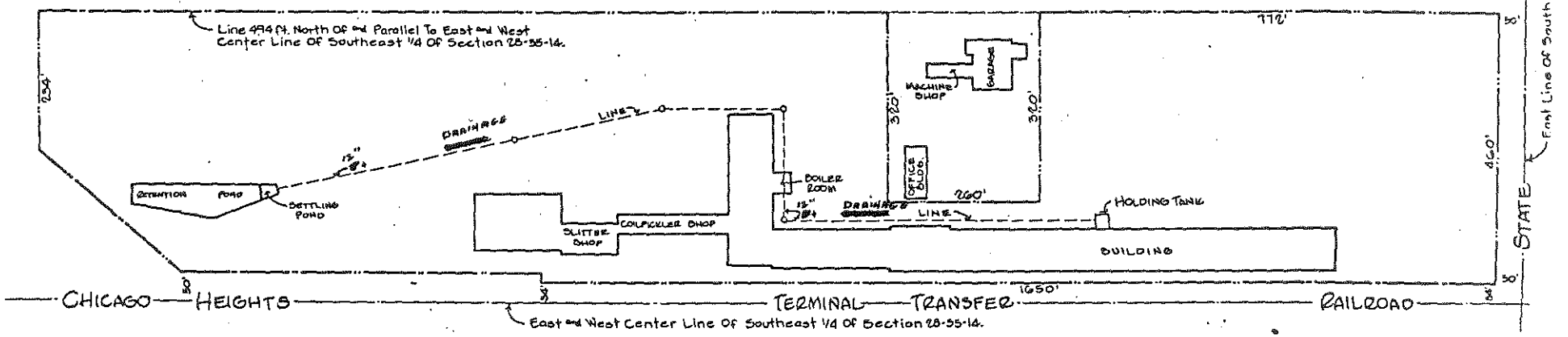
5467 II SW (HARVEY)

5-8

70-30

UNITED STATES
DEPARTMENT O THE INTERIOR
GEOLOGICAL SURVEY

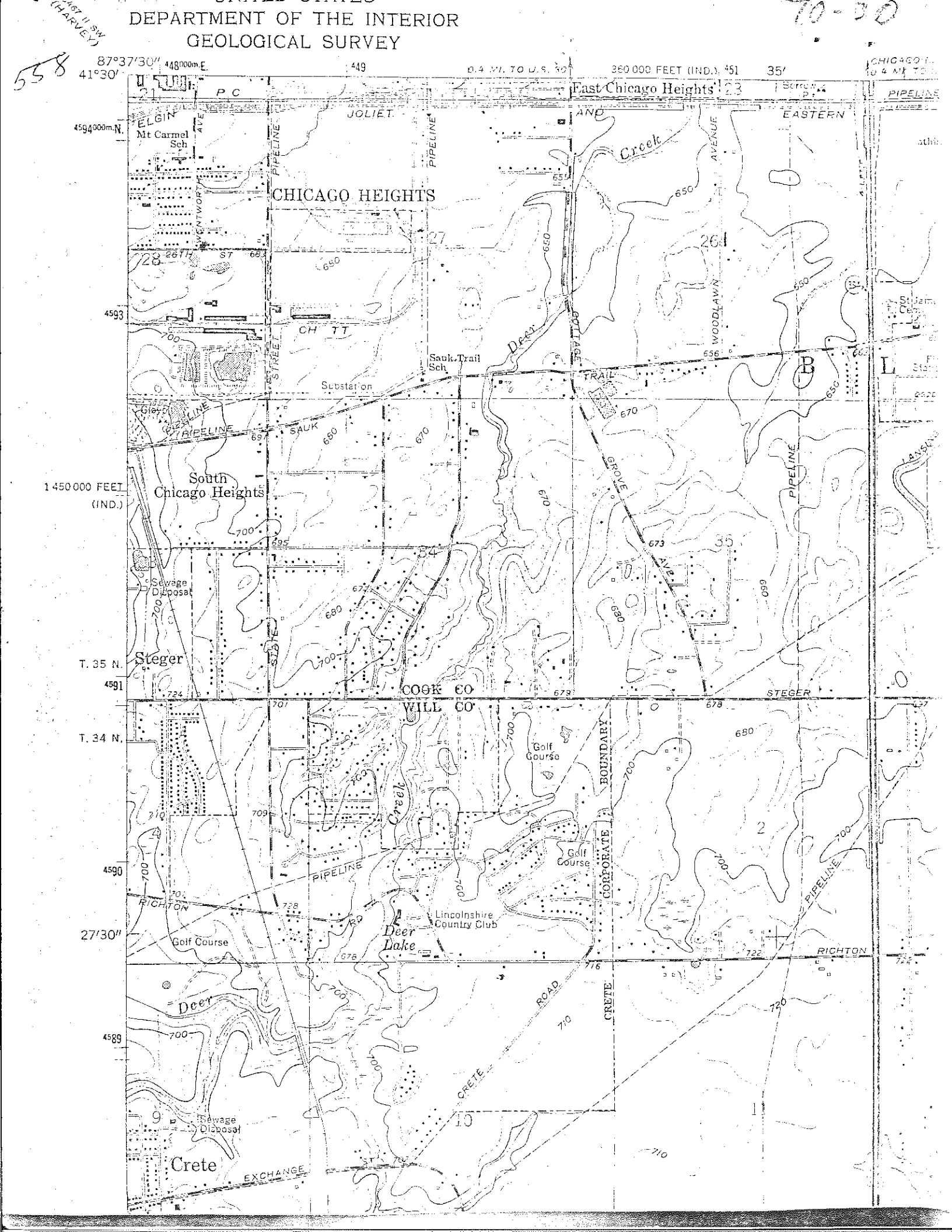




SCALE: 1" = 100'

DATE: NOV. 5TH 1980

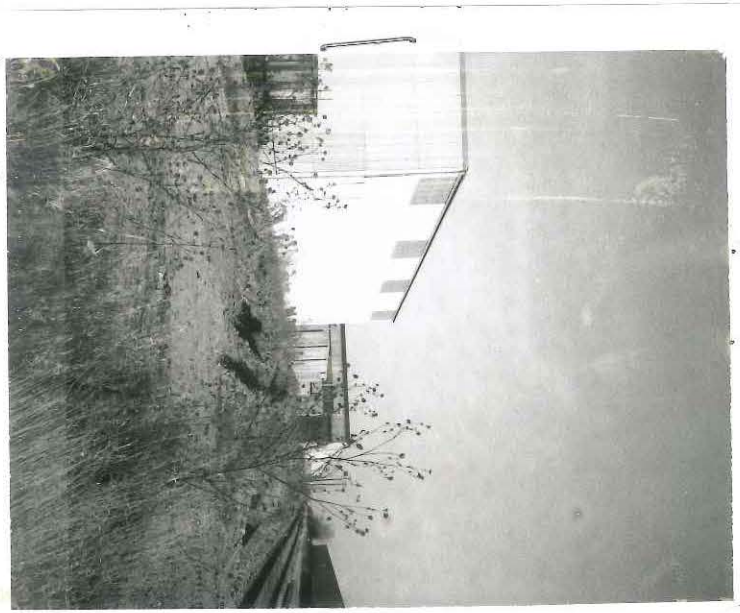
REDUCED COPY


UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY
87°37'30"
41°30'
448 000m.E.
449
0.4 MI. TO U.S. 30
360 000 FEET (IND.)
451
East Chicago Heights
PIPELINE
JOLIET
AND
EASTERN
ELGIN
Mt Carmel Sch
4594 000m.N.
AVE
PIPELINE
PIPELINE
Creek
AVENUE
CHICAGO HEIGHTS
WENTWORTH
26TH ST
STREET
CH TT
4593
Deer
COTTAGE
WOODLAWN
Sauk Trail Sch
TRAIL
Substation
Glass
PIPELINE
PIPELINE
SAUK
GROVE
PIPELINE
1 450 000 FEET (IND.)
South Chicago Heights
AVE.
Sewage Disposal
STATE
T. 35 N.
Steger
4591
COOK CO
WILL CO
STEGER
T. 34 N.
BOUNDARY
Golf Course
Creek
CORPORATE
Golf Course
4590
PIPELINE
RICHTON
RD
Lincolnshire Country Club
27'30"
Golf Course
Deer Lake
RICHTON
Deer
CRETE
ROAD
4589
CRETE
Sewage Disposal
Crete
EXCHANGE
ST
PIPELINE

11-13-80

11-12-80

11-12-80

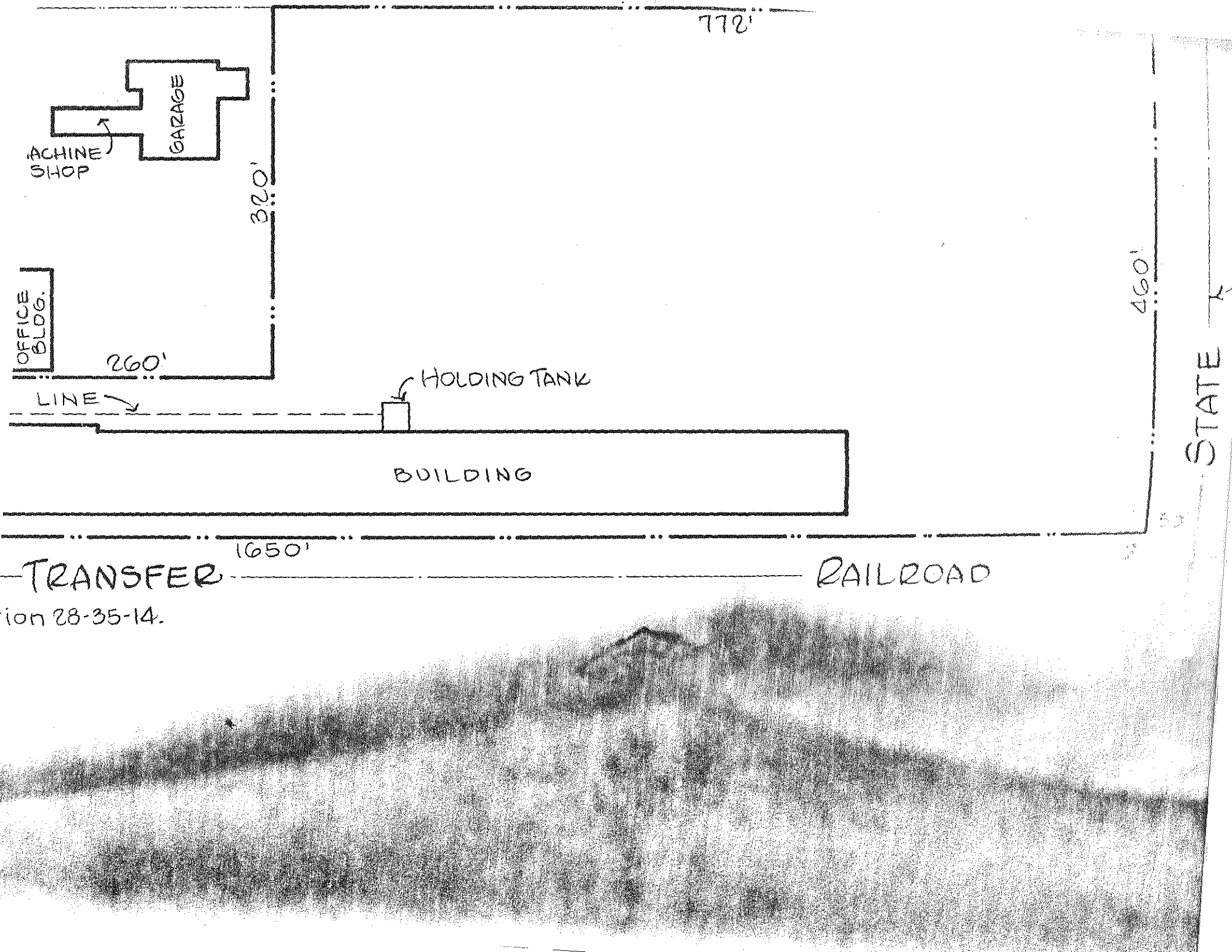


08-21-11

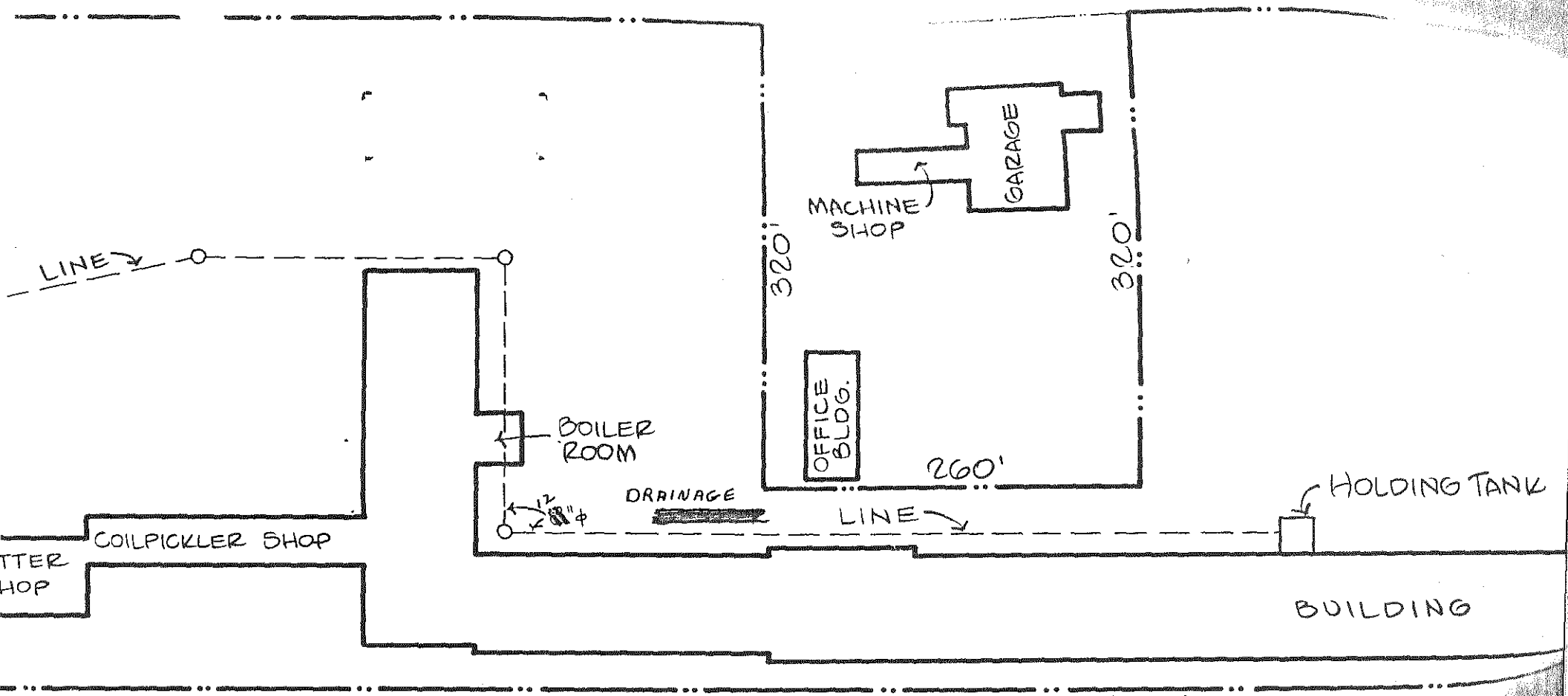
11-3-80

11-12-80 - OFFICE

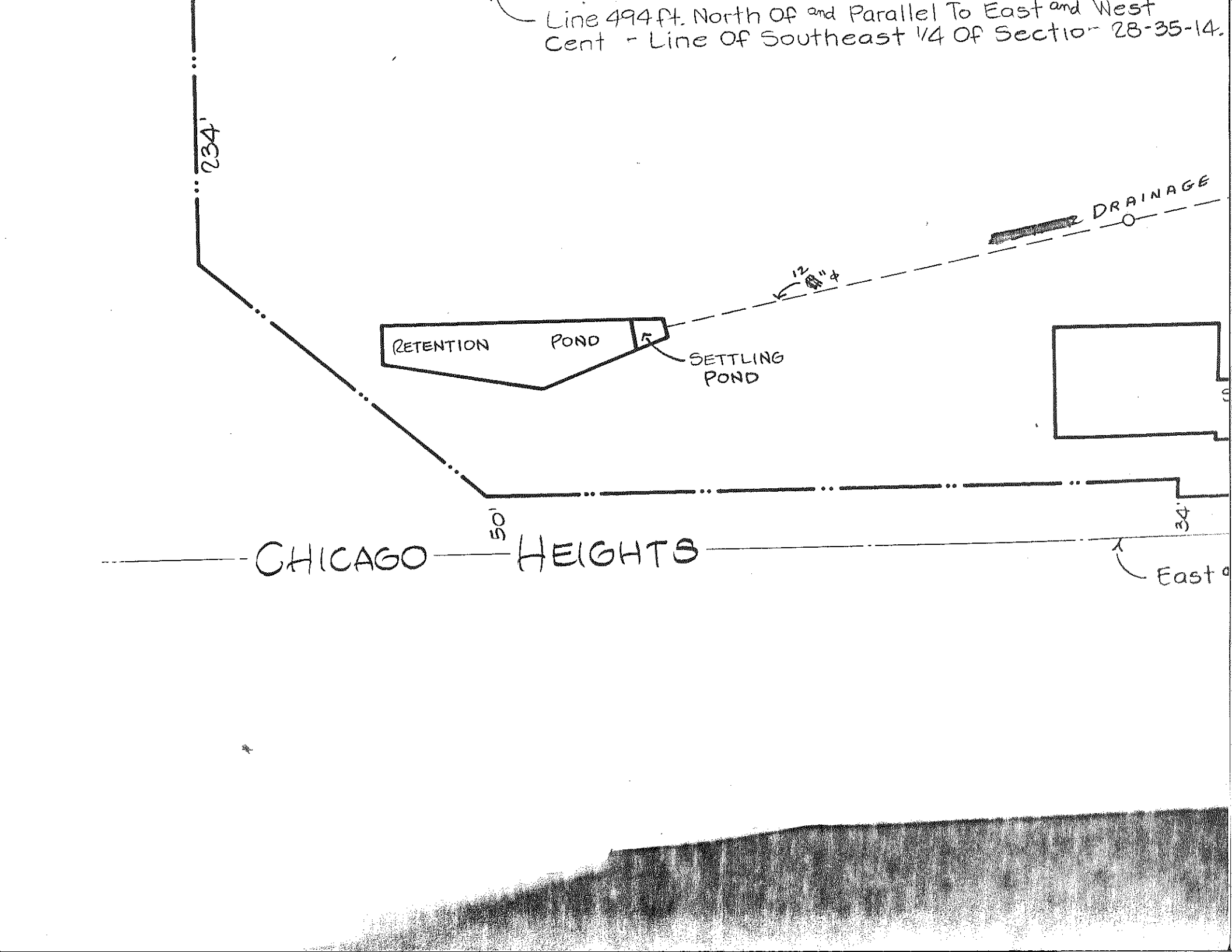
IRIEM
STEEL X PROCESSING
INC
PLANT 1
11-3-80


772'
GARAGE
ACHINE SHOP
320'
OFFICE BLDG.
260'
HOLDING TANK
LINE
BUILDING
460'
STATE
1650'
TRANSFER
RAILROAD

ion 28-35-14.



West Center Line Of Southeast 1/4 Of Section 28-35-14.


Line 494 ft. North Of and Parallel To East and West
Cent - Line Of Southeast 1/4 Of Section 28-35-14.
234'
DRAINAGE
12" ϕ
RETENTION POND
SETTLING POND
50'
34'
CHICAGO HEIGHTS
East

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: ILD001744572

TRIEM STEEL & PROCESSING INC
PO BOX 578
CHICAGO HTS IL 60411

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status"(or the State program equivalent), while complying with applicable technical and record-keeping standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

David A. Stringham
Chief, Solid Waste Branch

Enclosure

UNITE[D] STATES ENVIRONMENTAL PROTECT[ION] AGENCY
REGION V

4/16/81

DATE: APR 16 1981

SUBJECT: Triem Steel & Processing, Inc.
Compliance Order
Docket No. EPA-V-W-81-R-13

FROM: Tony Holoska
Engineering Unit II T.H.

TO: Carey S. Rosemarin
Legal Support Section

Per your request, I have reviewed:

1) The April 2, 1981, letter from Triem requesting that their interim status be dropped; and

2) pages 33076 and 33234 of the May 19th Federal Register on Hazardous Wastes.

From the information submitted from Triem, their wastewater treatment plant falls within the definition of a, "totally enclosed treatment facility". I recommend that we grant them their request to be dropped from interim status.

cc: Miner/DiDomenico

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD001744572 REACKNOWLEDGEMENT

TRIEM STEEL & PROCESSING INC
PO BOX 578
CHICAGO HTS IL 60411

INSTALLATION ADDRESS

26TH & STATE STREET
CHICAGO HTS IL 60411

EPA Form 8700-12B (4-80)

09/28/81

A.3 Groundwater/Soil

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Division File DATE: 11-19-82

FROM: R. Kleeter

☐ Information only

SUBJECT: ILD020938290
03104502 Cook County Chicago Heights/Triem Steel

☐ Response requested

The chemical analysis on the sludge from the holding tank was received. (See attached). EP toxicity for both chromium and lead was below the standards.

It will be recommended to Triem that they petition to delist the sludge as a hazardous waste so as to be totally exempt from the regulations.

This conclusion is reached by the following: Their treatment system meets the definition for a "totally enclosed treatment system" as per the definition given under Section 720.110. Section 725.101c9 states that this type of system is exempt from the requirements of Section 725. The settling and evaporation ponds meet the definition of a tank (Section 720.110); the facility is not a storage facility because of having a surface impoundment. Triem will be a generator once the sludge is removed from the tank and it becomes a waste. The sludge is hazardous by definition - Section 721.103c. By petitioning to delist the sludge - Section 720.122 - Triem will be able to become exempt from the generator regulations.

EPA-90A (6/75-10M) GR-91A

JOSEPH A. SCHUDT & ASSOCIATES

CIVIL ENGINEERS – SURVEYORS – LAND PLANNERS

3920 WEST 216TH STREET GOVERNORS HIGHWAY AT 216TH STREET

MATTESON, ILLINOIS 60443

George C. Ranney
Joseph A. Schudt

John W. Budrick
J. Stephen Dieter
G. William Fetherling
Michael Enich

Joseph A. Schudt, Sr.
Consultant

Local 748-1683
Chicago 785-6162

October 22, 1982

Illinois E. P. A.
1701 S. First Street
Maywood, Illinois 60153

ATTN: Ms. Bonnie Elder

United States E. P. A.
Waste Management Branch
230 S. Dearborn Street
Chicago, Illinois 60525

ATTN: Ms. Gale R. Hruska

RE: Triem Steel Treatment Process
Chicago Heights, Illinois

Dear Ms. Elder and Ms. Hruska:

I am herewith enclosing the analytical report for toxic minerals as requested on the above referenced site. The tests were performed by Gulf Coast Laboratories, Inc., and were taken from the residue of the holding tank as requested. The levels of chromium and lead were well within the required limits as shown on the enclosed report.

In view of this report, along with the previous determination that this is a closed system, we hereby request a letter closing out this matter.

Respectfully submitted,

JOSEPH A. SCHUDT & ASSOCIATES

George C. Ranney

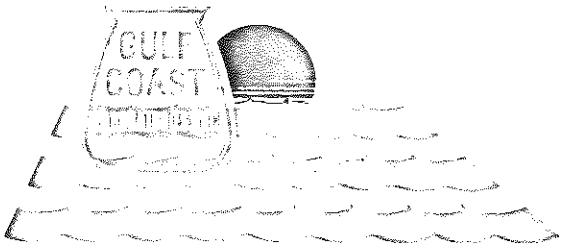
George C. Ranney, P.E. bgf

GCR:bgf
Enclosure

cc: Mr. John Fredericksen - Triem Steel
Mr. Leonard Triem - Triem Steel

RECEIVED
NOV 1 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
11/05/82



GULF COAST LABORATORIES, INC.
2417 Bond St., Park Forest South, Illinois 60466
Phones (312) 534-5200 (219) 865-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Triem Steel
Box 578
Chicago Heights, Illinois 60411

ATTN: Mr. Fredrickson

DATE: October 18, 1982

RE: Sludge Sample
Sample Date: 10/05/82
GCL# 32572

PARAMETERS	E.P. TOXICITY LEACHATE	
Total Chromium	< 0.5	mg/l
Total Lead	< 0.5	mg/l

RECEIVED
OCT 20 '82

Approved: Donald Ripple

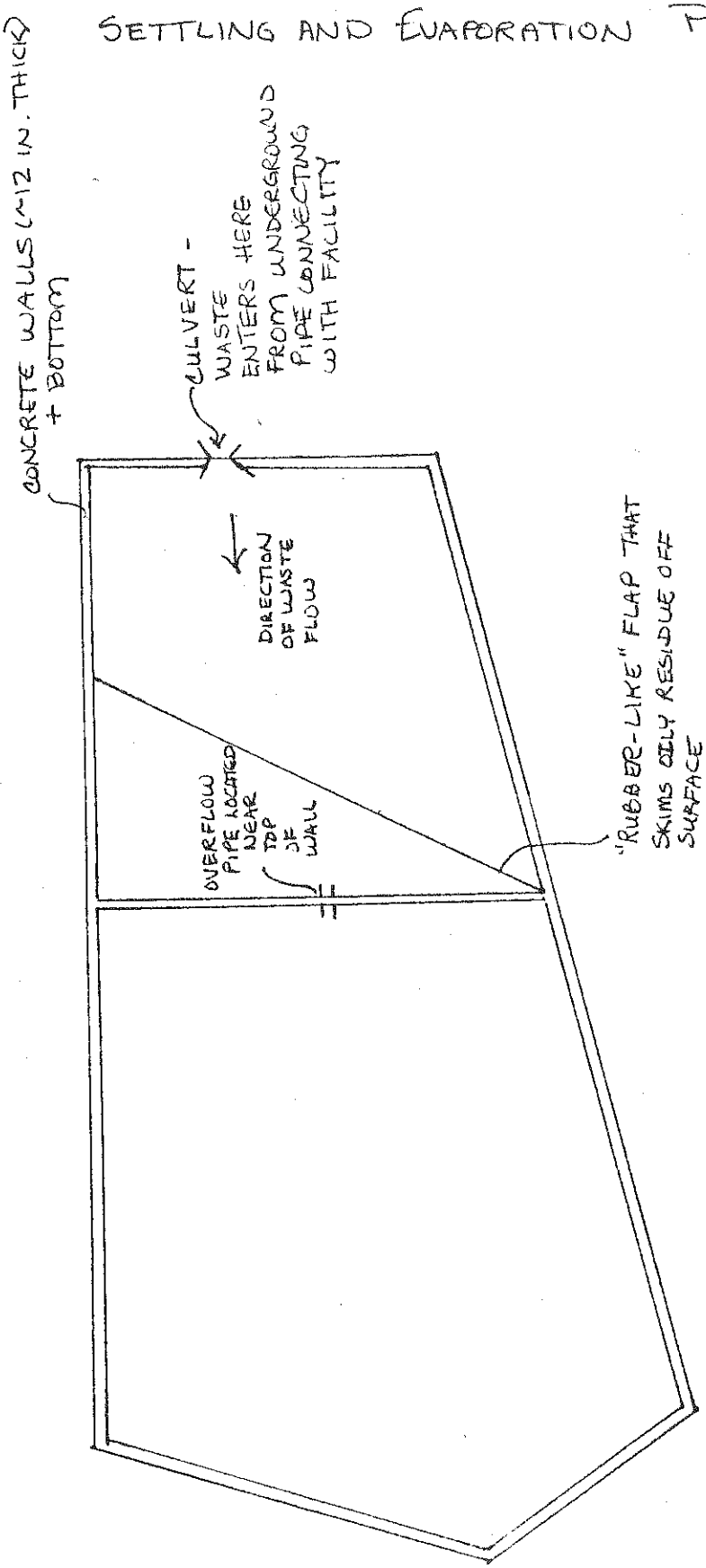
Analyst _____ Date 10/18/82

COOK COUNTY
03104509

CHICAGO HEIGHTS / TRIEM STEEL

9-8-82

SETTLING AND EVAPORATION PONDS (TANK)



NOTE: TANK IS UNCOVERED AND SITS IN A DEPRESSION, IS ENCLOSED BY A CYCLONE FENCE

A.4 Closure/ Post-Closure

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5544

March 5, 1984

Mr. Basil G. Constantelos, Director
Waste Management Division
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60606

Re: Request for Compliance Order
Triem Steel and Processing, Inc.
Chicago Heights, Illinois
EPA File #7055-HAZ

Dear Mr. Constantelos:

This Agency hereby requests that a Compliance Order be issued to the above-referenced facility for violations of the RCRA financial assurance regulations. Specific violations of the State of Illinois RCRA regulations (and Federal regulations) pertaining to financial assurance are set forth in the attached draft Complaint.

This Agency has searched its records and finds that the appropriate financial assurance documents have not been filed with the IEPA.

The USEPA supplied the IEPA with a list of those facilities which are required to file financial assurance responsibility documents. Working from the list supplied by USEPA, this Agency has determined that there has been a complete failure to comply with the applicable regulations by the above subject facility.

Please note that the attached draft Compliance Order contains certain blanks so that information can be inserted by the USEPA. Specifically, the amount of civil penalty requested should be inserted by USEPA. However, please note that this Agency recommends a minimum penalty of $25,000. Also, the USEPA should fill out the name of the employee at the USEPA that should be contacted by the Respondent if Respondent elects to request an informational conference. That person's telephone number should also be included in the Compliance Order.

The IEPA staff attorney assigned to this matter is Mr. Don Gimbel. Mr. Gimbel's address is: Illinois Environmental Protection Agency, Division of Land Pollution Control, 1701 First Avenue, Maywood, Illinois 60153, telephone 312/345-9780. This Agency requests that you or your designee

advise Mr. Gimbel as to whether or not the USEPA elects to proceed with a Compliance Order in accordance with the request herein. Also, please have Mr. Gimbel advised of the name of the USEPA attorney assigned to this matter so that our respective legal staffs can keep one another informed as to the progress of the Compliance Order. In order for Mr. Gimbel to properly maintain Agency records, it is important that he receive the following: A copy of the actual Compliance Order submitted, the date upon which the Compliance Order is transmitted to Respondent, copies of written answers or other documents filed by Respondent, and information concerning the final resolution.

All relevant attachments are included with this original communication. I trust you will forward the relevant attachments to the USEPA assigned attorney.

Thank you in advance for your assistance.

Sincerely,

Wm Seltzer

William Seltzer
Senior Technical Advisor

Attachments
WS:bkm
cc: Bill Miner, USEPA
Mary Gade, USEPA
Bill Radlinski
Don Gimbel

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: March 2, 1984

: File

FROM: Bill Seltzer WS

SUBJECT: Triem Steel and Processing, Inc.
EPA File #7055-HAZ

USEPA provided IEPA with a list of facilities that were required to file financial assurance responsibility documents. Triem Steel and Processing, Inc., is one of the facilities listed by USEPA.

By letter dated July 28, 1983, IEPA notified the facility of the financial assurance responsibility requirements. The notification letter was delivered August 3, 1983, and accepted according to the green return receipt card.

Records of the Illinois Secretary of State (Corporation Division) reveal that the above-captioned facility is neither an Illinois corporation nor a foreign corporation licensed to do business in Illinois. Therefore, the caption on the draft complaint being sent to USEPA is incorrect. Since the information IEPA received with respect to the facility's name is incorrect, USEPA should verify its own information to determine the correct caption of the facility being sued.

IEPA records reveal that this Agency never received a response to its letter of July 28, 1983, and never received any financial assurance documentations from the facility.

WS:bkm

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5544

July 28, 1983

Certified Mail
Return Receipt Requested

Triem Steel and Processing, Inc.
26th and State Street
Chicago Heights, Illinois 60411

Attn: Leonard Triem, President
ILD001744572

Dear Mr. Triem:

Laws of both the Federal Government and the State of Illinois require an owner or operator of each hazardous waste management facility to provide assurance that funds will be available for properly closing, and in the case of a disposal facility, for maintaining and monitoring facilities after closure. Such financial responsibility assurances have been found necessary by the numerous instances of environmental damage resulting from the abandonment of facilities and other failure for closure and post-closure care in a timely manner.

Proof of financial responsibility as discussed above was to have been supplied to the Director of the Illinois Environmental Protection Agency. However, it appears that a hazardous waste management facility in your organization has failed to comport with the law by failing to submit the required financial assurances to the Illinois Environmental Protection Agency. The name of the facility in question is Triem Steel and Processing, Inc., located at 26th and State Street, Chicago Heights, Illinois 60411.

Failure to supply the required proof of financial responsibility is a violation of 35 Ill. Adm. Code Subpart H (see particularly Sections 725.243 and 725.245). Additionally, failure to submit proof of financial responsibility violates Sections 21(e), 21(f)(2), and 21 (i) of the Illinois Environmental Protection Act (Ill. Rev. Stat., Ch. 111-1/2, pars. 1021(e), 1021(f)(2), and 1021(i)). Finally, failure to submit proof of financial responsibility is a violation of the Code of Federal Regulations. (See 40 CFR Subpart H).

Please take notice that a violation of the Illinois Environmental Protection Act or any regulations adopted thereunder may subject the violator to a civil penalty not to exceed $10,000 for said violation and an additional penalty not to exceed $1,000 for each day during which the violation continues. Furthermore, certain violations of the Illinois

Environmental Protection Act, including Sections 21(f) and 21(i), may subject the violator to a civil penalty not to exceed $25,000 per day, each day the violation continues (see Illinois Environmental Protection Act at Section 42 for potential civil penalties and Section 44 for potential criminal sanctions).

You are hereby advised that documentation demonstrating compliance with the applicable proof of financial responsibility must be submitted to the Illinois Environmental Protection Agency no later than ten (10) working days after receipt of this communication. The Director of this Agency has designated Mr. Andrew Vollmer as the Agency employee responsible for accepting and filing proof of financial responsibility. Therefore, your submissions should be made directly to Mr. Andrew Vollmer, Illinois Environmental Protection Agency, Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois 62706.

Please take notice that failure to supply the required proof of financial responsibility will cause this Agency to refer the matter to the Illinois Attorney General's Office for prosecution. Additionally, the Agency will formally refer the matter to the United States Environmental Protection Agency.

Failure to comply with the financial assurance requirements specified under the law is viewed by this Agency as an inexcusable and serious deviation from laws designed to protect our environment for future generations. Any referral for prosecution resulting from continued failure to comply with the law will be accompanied by this Agency's recommendation that the prosecuting agency seek the maximum penalties allowable under law.

In the very near future, the Illinois Environmental Protection Agency will be releasing a list of all hazardous waste management facilities that failed to submit required proof of financial responsibility. Your prompt and satisfactory response to this communication is urged.

Sincerely,

R C Kuykendall

Mr. Robert G. Kuykendall
Manager
Division of Land Pollution Control

RGK:qml/7500c/44-45

PS Form 3811, July 1982

SENDER: Complete items 1, 2, 3, and [illegible] Add your address in the "RE[illegible]N TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
   - ☐ Show to whom and date delivered ..... ____¢
   - ☐ Show to whom, date, and address of delivery .. ____¢
2. ☐ RESTRICTED DELIVERY..... ____¢
   (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Triem Mill & Processing Inc
26th & State St.
Chicago Heights, Ill 60411
att: Leonard Triem Pres

4. TYPE OF SERVICE:
- ☐ REGISTERED ☐ INSURED
- ☒ CERTIFIED ☐ COD
- ☐ EXPRESS MAIL

ARTICLE NUMBER: 158134

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

J. Call

5. DATE OF DELIVERY: 8-3-83

POSTMARK (may be on reverse side)

CHICAGO ILL LOOP STA
AUG 3
1983
U.S.

6. ADDRESSEE'S ADDRESS *(Only if requested)*

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

★ GPO: 1982-379-593

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: March 2, 1984

TO: Don Gimbel

FROM: Bill Seltzer WS

SUBJECT: Referral to USEPA for Compliance Order

I have referred the below-specified case to the USEPA and requested that Compliance Order be issued for the facility's failure to comply with the financial assurance provisions of RCRA.

The referral has already been made. However, I would like you to carry this case along with your regular case load. Most likely, the only thing that will have to be done is that you will track the case's progress with the USEPA. The matter should be credited to you for the purposes of brochure referrals and should be carried on your bi-monthly status report.

The case is as follows:

Triem Steel and Processing, Inc.
Chicago Heights, Illinois
EPA File #7055-HAZ

WS:bkm

C.2 Compliance/ Enforcement

ILLINOIS
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153

312/345-9780

YES 1/6/83 ?

Refer to: 03104509 - Cook County - Chicago Heights/Triem Steel
ILD020958298

November 18, 1982

Mr. George C. Ranney
Joseph A. Schudt & Associates
3920 W. 216th Street
Matteson, Illinois 60443

Mr. John Fredericksen
Triem Steel
26th & State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Gentlemen:

On September 9, 1982 an inspection was made of your facility. It has been determined that your facility is exempt from regulation under 35 Ill. Adm. Code 725 for treatment, storage, and disposal facilities in that your treatment system meets the definition for a "totally enclosed treatment system", and the settling and evaporation ponds meet the definition of a "tank".

Although the results of the analysis done on the sludge from the holding tank show that it is not hazardous by the characteristic of EP toxicity for neither chromium nor lead, 35 Ill. Adm. Code 721.103c states: "Any solid waste generated from the treatment ... of a hazardous waste, including any sludge ..., is a hazardous waste". Triem Steel would therefore be subject to regulation as a generator once the sludge is actually removed from the tank (35 Ill. Adm. Code 722). This waste can be delisted by petitioning to both IEPA and USEPA. This procedure is outlined in 35 Ill. Adm. Code 720.122 and 40 CFR 260.22.

A reply to this letter is requested stating what position Triem Steel will be taking. If there are any questions, please do not hesitate to contact Bonnie Eleder at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BLE:prb

Enclosure: 35 Ill. Adm. Code 700-725

cc: Division File
Northern Region
U.S. E.P.A. - Region V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: SEPTEMBER 9, 1982

SUBJECT: Inspection of Triem Steel and Processing Inspection, Chicago Heights, Illinois ILD020958298

FROM: GALE HRUSKA

TO: PART A FILE

Participants: G. HRUSKA (USEPA), Bonnie Eleder (IEPA), George RANNEY (engineer for Triem Steel), John Fredrickson (Triem Steel)

Background: In 1981 AN ISS inspection WAS made at the facility and a compliance order was issued. On June 17, 1981 the order was withdrawn, USEPA having determined that the Triem facility met the definition of a "totally enclosed treatment facility". The facility also requested to withdraw its permit (according to a memo in the file).

I was given the assignment to determine if we should send out an interim status acknowledgement letter. During the review of the part A permit application and the compliance action files it came to my attention that the facility included an evaporation pond and a settling pond which might be considered as a surface impoundment. After contacting IEPA it was agreed that an inspection was warrented.

Results of inspection

On September 8, 1982, an inspection of the settling and evaporation ponds was made. The following description is a result of the visual inspection and our meeting:

The facility generates spent pickle liquor (K062). It is neutralized in a closed system which apparently meets the definition of a totally enclosed treatment facility. The effluent from this treatment goes to a settling pond, where oil is skimmed from the pond and sent for disposal. Excess water is allowed to trickle into an evaporation pond, while any sludge is allowed to accumulate in the settling pond. This system has been in use for about 1 3/4 years.

The settling pond was full of liquids while the evaporation pond was virtually empty. There was only a thin, scattered

layer of sediment in the evaporation pond. Our conversation with Mr. Ranney and Mr. Fredrickson further informed us that neither of the units have ever been emptied of sludge, however they expect to take the sludge out of the settling pond this fall. The sludge has not been analyzed to date.

Bonnie Elender told the Triem representatives that IEPA would consider the matter and get back to them.

Analysis

The effluent going into the ponds is a solid waste generated from the treatment of a hazardous waste and is therefore a hazardous waste and is regulated (§261.3). The question to be answered is: Is the double pond system an uncovered tank or is it a surface impoundment? After reading the preamble to the Part 264 regulations dealing with Tanks and surface impoundments (FR 45,98, May 19, 1980 pp. 33200-33204), and after speaking with Bob Stone, it appears that the ponds meet the definition of a Tank. (They are constructed of non-earthen materials, ie concrete; they appear to provide structural support as opposed to being used as a liner; and they appear to continuously connected, with no seams visable.)

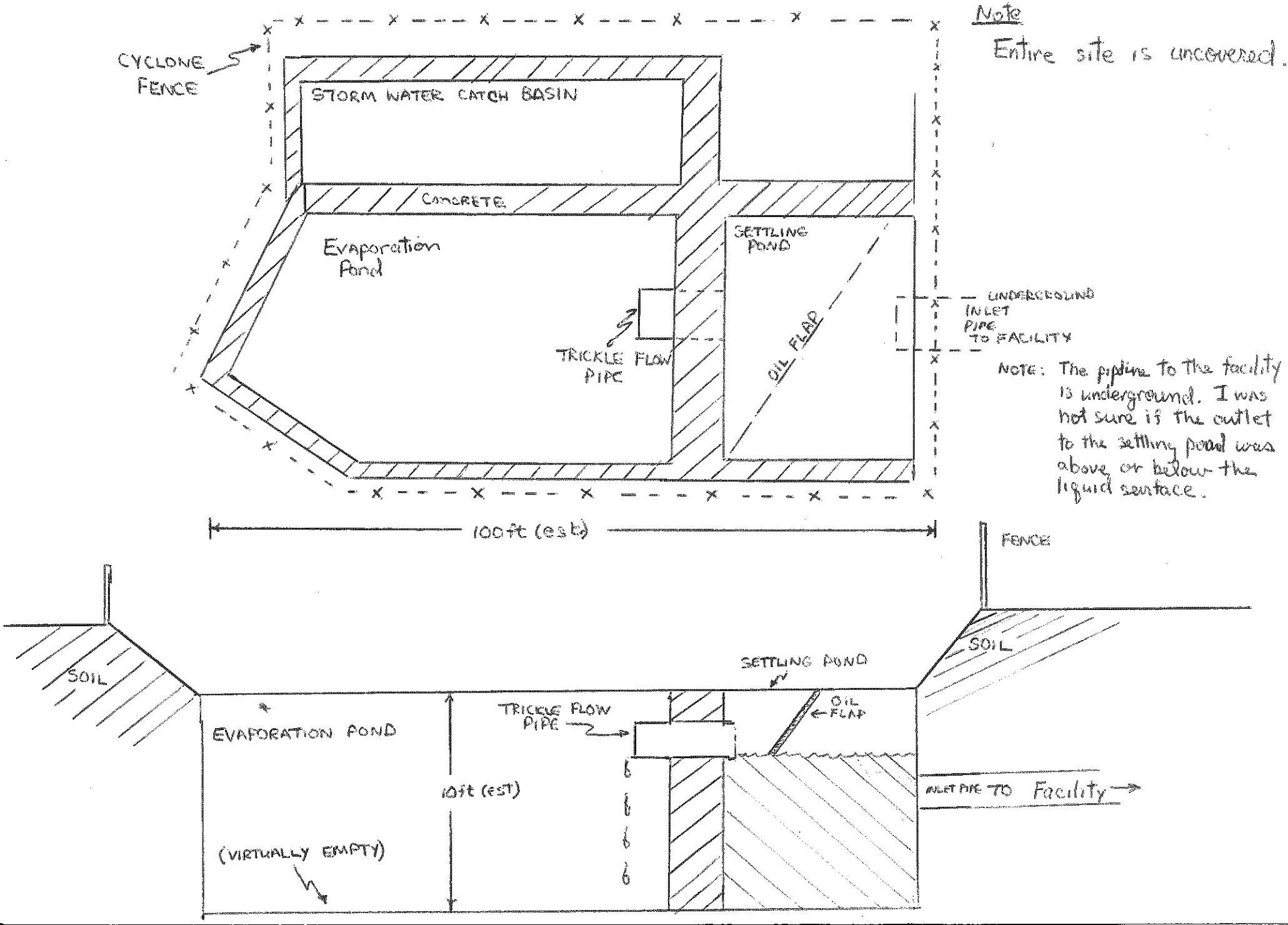
Subsequent Actions

I spoke with Bonnie Eleder of IEPA on 9/10/82. IEPA also feels that the ponds should be considered as a Tank for regulatory purposes. Triem Steel is going to have the waste analyzed and submit the analysis to IEPA. IEPA will then procede to take the necessary actions to bring the facility into compliance. IEPA will inform the facility that it needs to submit a revised Part A application to USEPA.

I recommend that USEPA not take any regulatory action against the facility until at least the revised Part A is submitted since it USEPA who erroneously advised the facility that they were non-regulated

CC: Horst Witschonke
Bonnie Eleder, IEPA
Bob Stone, SIO

TRIEM STEEL SURFACE IMPOUNDMENT OR TANK



Note

Entire site is uncovered.

NOTE: The pipline to the facility is underground. I was not sure if the outlet to the settling pond was above or below the liquid sentace.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Division File DATE: 9-8-82

FROM: R. Kinder

☐ Information only

SUBJECT: IL0928055238
03106309 Cook County Chicago Heights/TRIEM Steel

☐ Response requested

On this date an inspection was made of the above noted facility. Accompanying this inspector were: Gale Hardska - USEPA; George Ranney - engineer for Triem Steel; and John Vredeickson - Triem Steel. The purpose was to inspect the settling and evaporation ponds, and make the determination of which of the regulations apply to this facility.

As background: In 1981, the determination was made by USEPA that Triem Steel met the definition of a "totally enclosed treatment facility" and therefore was exempt from the 40CFR265 regulations for TSD facilities. A recent review of the file by USEPA personnel, though, indicated that the settling and evaporation ponds might constitute a surface impoundment, therefore bringing this facility out of its "exempt" status due to being a storage facility. Therefore, Gale Hardska with USEPA contacted this inspector and an inspection was arranged.

Inspection results: The facility generates spent pickle liquor - K062. The spent pickle liquor is emptied directly from its point of generation into an underground tank via a closed system. A neutralizing solution is added. Clear water follows for cleaning out the lines and tank. This solution runs into the settling pond. Some additional in-line neutralization occurs, and eventually enters into the settling pond. All lines are closed from the point of generation of the spent pickle liquor to the point of the neutralized waste entering the settling pond. Before entering the settling pond, this waste stream is approximately 80% treated. The remainder of the treatment comes in the ponds. First, some solids settle out while the oily residue floating on the surface is skimmed back. This oil is collected and sent for disposal. The pH is maintained close to neutral via daily checks. Overflow runs into the second pond for evaporation. Both ponds are constructed of concrete, with the walls appearing to be approximately 12 inches thick, the depth of the settling pond about 4-6 feet, and that of the evaporation pond about 10 feet. The settling pond contained a red liquid waste which became more orangey in the second compartment after the oil was skimmed off. The evaporation pond contained only a thin sprinkle of orangey liquid, and red-orange sediments covering the bottom. The system has been in operation for about 1-3/4 years. The sludges have never been cleaned out.

After the inspection it was determined that these ponds meet the definition for an uncovered tank - they are stationary and are constructed of non-earthen materials which provide structural support. Therefore, Triem is not regulated under the TSD regulations (ie. 40CFR265; Title 35 Subtitle G Part 725).

Triem remains a generator of hazardous waste and is subject to the appropriate regulations, this is because the sludge in the ponds is cleaned out of the tank. This is because the definition of hazardous waste (40CFR261.3c2; Title 35 S. C. Part 721.103c), states that a sludge generated from the treatment of a listed hazardous waste remains a hazardous waste. The facility can petition for delisting of the sludge if it can be shown not to be hazardous by the characteristic tests. They would simply sample the sludge and have it analyzed with the results sent to us.

EPA-90A (6/75-10M) GR-91A

SEWAGE

JUN 17 1981

Clayton M. Wasserott, Plant Manager
Trieu Steel and Processing, Inc.
26th and State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Re: Docket No. EPA-V-W-81-R-13

Dear Mr. Wasserott:

In response to your letter of April 2, 1981, asserting that your facility meets the definition of "Totally Enclosed Treatment Facility," as defined in 40 CFR 260.10(a)(70), we have made a determination to withdraw the Compliance Order issued on December 5, 1980. Therefore, please find enclosed an Order to Withdraw Complaint. This action relieves you of any further obligation to respond to the Compliance Order.

If you have any questions, please contact Mr. Carey T. Rosemarin, an attorney on my staff, at (312) 353-2094.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

C ROSEMARIN:dp:5/19/81
6-6752

SCHULTIES

GRIMES

HOLOSKA

cc: John Moore
Manager, Division of Land Pollution Control
Illinois Environmental Protection Agency (IEPA)

Paul Riebel
Office of Illinois Attorney General

bcc: Holoska
Schulteis
Leder
Donaldson/Biros
Stone

UNTIED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF: TRIEM STEEL AND PROCESSING CHICAGO HEIGHTS, ILLINOIS EPA ID No. IL D 020958278	)	DOCKET NO. V-W-81-R-13

ORDER TO WITHDRAW COMPLAINT

Director, Enforcement Division, Region V, of the United States Environmental Protection Agency, having been duly delegated that authority by the Regional Administrator, hereby withdraws the Complaint issued on December 5, 1980, to Triem Steel and Processing. This Order is issued pursuant to the Consolidated Rules of Practice, 40 CFR Part 22.14(e), for the following reasons:

1. The Complaint cited Triem Steel and Processing for noncompliance with 40 CFR Part 265.

2. In telephone conversations and in a letter dated April 2, 1981, Triem Steel and Processing, Inc. submitted sufficient evidence to establish that the facility meets the definition of "totally enclosed treatment facility" in 40 CFR 260.10(a)(70).

Sandra S. Gardebring
Director, Enforcement Division

Dated: 6/12/81

P.O. BOX 578
26th AND STATE STREETS
.CAGO HEIGHTS, ILLINOIS 60411

TRIEM STEEL & PROCESSING, INC.

PHONE: 312 / 757-6060

April 2, 1981

Carey S. Rosemarin, Enforcement Attorney
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attn: 5EWHME

Re: Compliance Order
Triem Steel & Processing, Inc.
Docket No. EPA-V-W-81-R-13

Dear Mr. Rosemarin:

Thank you for your courtesy and information you gave me during our telephone conversation of March 12, 1981. Your information is a tremendous help to me in understanding the regulations concerning our plant.

I do believe our facility does qualify as a "Totally Enclosed Treatment Facility" (40 CFR, Section 265.1, (c) (9), page 33234, of the May 19, 1980 Regulations), therefore, as you suggest in your letter dated March 18, 1981, which we received March 23, 1981, we do not wish interim status. Enclosed are supporting documents.

I believe these documents will clearly explain our operation. If you require further information please call and I will answer any questions you might have.

Thank you for your assistance and for giving us the time to answer the Compliance Order.

Very truly yours,

TRIEM STEEL & PROCESSING, INC.

Clayton H. Wasserott
Plant Manager

CHW:bp

Encls.: 1. Site Layout
2. PH Control

RESPONSE

Clayton H. Wasserott, Plant Manager
Trico Steel and Processing, Inc.
26th and State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Re: Docket No. EPA-V-W-81-R-13

Dear Mr. Wasserott:

In response to your letter of April 2, 1981, asserting that your facility meets the definition of "Totally Enclosed Treatment Facility," as defined in 40 CFR 260.10(a)(70), we have made a determination to withdraw the Compliance Order issued on December 5, 1980. Therefore, please find enclosed an Order to Withdraw Complaint. This action relieves you of any further obligation to respond to the Compliance Order.

If you have any questions, please contact Mr. Carey S. Rosemarin, an attorney on my staff, at (312) 353-2094.

Very truly yours,
Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

bcc: Holoska
Schultheis
Leder
Donaldson/Biros
Stone

John Moore
Manager, Division of Land Pollution Control
Illinois Environmental Protection Agency (IEPA)

Paul Biebel
Office of Illinois Attorney General

C ROSEMARIN:dp:5/19/81
6-6752

SCHULTIES G. Small for SES 5/22/81

GRIMES 5/22

HOLOSKA

MINER 5/29

FENNER 6/8

BRYSON

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: APR 0 1 1981

SUBJECT: Triem Steel Company, Chicago Heights, Illinois
EPA ID No. IL D 020958278

FROM: Tony Holoska, Environmental Engineer, Engineering Section J.H

TO: Cary Rosemarin, Attorney
Legal Support Section

In Summary:

1. A Compliance Order was sent to Triem for RCRA violations on December 5, 1980. Violations cited were:

a) fencing and danger signs were absent, § 265.14;

b) description and record of training were absent, § 265.16;

c) operator must make arrangements with local emergency response authorities, § 265.37;

d) operator must have a contingency plan, § 265.51;

e) operator must maintain a written operating record, § 265.73; and

f) operator must inspect the treatment facility, § 265.403.

Triem has responded to the CO by:

1. phone call on December 16, 1980; and

2. letters on December 16, 1980, January 5, 1981, and February 27, 1981.

The letters indicate that Triem has complied with the intent of RCRA for the violations cited.

I recommend that this CO be closed out at the earliest time possible.

cc: Miner/DiDomenico

MAR 1 8 1981

5EWHME

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Clay Wasserott, Plant Manager
Triem Steel and Processing, Inc.
26th and State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Re: Compliance Order
Triem Steel and Processing, Inc.
Docket No. EPA-V-W-81-R-13

Dear Mr. Wasserott:

Thank you for your letter of February 27, 1981. Per our telephone conversation of March 12, 1981, I have enclosed amendments to the May 19, 1980, regulations that you already have.

As we discussed, it is possible that the requirements of Part 265 do not apply to your facility under 40 CFR, Section 265.1. As you noted, this may be true because your facility may qualify as a totally enclosed treatment facility (40 CFR, Section 265.1(c)(9), page 33234 of the May 19, 1980, regulations). It is also possible that the facility is an "elementary neutralization unit," or "wastewater treatment unit" (see November 17, 1980, copy of the Federal Register, enclosed).

If you believe that the site qualifies as a totally enclosed treatment facility, elementary neutralization unit, or wastewater treatment unit, and you do not wish interim status, please so inform this office and submit supporting documents within two weeks from the date of receipt of this letter. Thank you for your cooperation.

Very truly yours,

Carey S. Rosemarin
Enforcement Attorney

Enclosures

3/18/81
3/16/81
3/17/81

5EWHME:3/16/81
CSROSEMARIN:bb:6-6717

WALKER

P.O. BOX 578
26th AND STATE STREETS
C...CAGO HEIGHTS, ILLINOIS 60411

TRIEM STEEL & PROCESSING, INC.

PHONE: 312 / 757-6060

February 27, 1981

Director, Enforcement Division
Region V
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604
Attn: Compliance Section

Re: Compliance Order
Docket No. EPA-V-W-81-R-13
Triem Steel & Processing, Inc.
EPA ID No. IL D 020958278

Per the requirements of Section 265.13 - .16, 265.51 - .56, 265.73, and 265.17, as set forth in the November 19, 1980, Federal Register, we feel we have achieved compliance with the above subject Order.

Section 265.13 - General Waste Analysis

We have obtained and have on file, a detailed chemical and physical analysis. We have developed and are following a written waste analysis plan.

Section 265.14 - Security

We have 24-hour surveillance. The facility is entirely surrounded by fencing. "Danger" signs have been installed.

Section 265.15 - General Inspection Requirements

Our facility is inspected weekly and we have a written inspection schedule and log on file.

Section 265.16 - Personnel Training

Since our facility description is the same as described in Part 260, Subpart B, 260.10 (70), page 33074 of the May 19, 1980, Federal Register, we feel we are not required to have a personnel training program, however, we have held safety and training meetings dealing with the employees' responsibilities. We will further train our maintenance employees to handle leaks in our underground system and problem correction. We have documented job titles, job description and a training log.

Director, Enforcement Division February 27, 1981

Section 265.17 - General Requirements for Ignitable, Reactive or Incompatible Wastes

Not applicable to our facility since no flash point is involved in our waste product.

Section 265.51 through 265.56 - Contingency Plan and Emergency Procedures

Our facility is outside, enclosed and underground and we feel a contingency plan is not applicable at this time. In the event a leak occurs in our underground system we would cease operations and close the valves until repairs are made.

(Part 260, Subpart B, 260.10 (70), page 33074 of May 19, 1980, Federal Register - "Totally enclosed treatment facility" means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.)

Section 265.73 - Operating Record

We have a written operating record at the facility as outlined in Appendix I, of the May 19, 1980, Federal Register.

Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the foregoing information is true, accurate, and complete.

TRIEM STEEL & PROCESSING, INC.

Clayton H. Wasserott

Clayton H. Wasserott
Plant Manager

CHW:bp

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 19, 1981

SUBJECT: Report of ISS inspection on 11/20/80

FROM: Eugene Meyer

TO: Jay S. Goldstein, Chief
Hazardous Waste Management Section

Company: Triem Steel and Processing, Inc., 26th & State Streets, Chicago Heights, Illinois 60411

Participants: Erin Moran, Tony Holaska, and Brad Benning (IEPA)

Objective: To review the facility for compliance with the hazardous waste regulations

Site description:

Other information: The facility is in non-compliance with a number of specific points: Danger ~~xx~~ signs are not posted; employees are not adequately trained in the procedures of handling H.W. properly; no contingency plan could be produced; no arrangements have been made with local emergency response groups; inspections of equipment for malfunction (etc.) were not being done.

Conclusions & recommendations

The facilty should be sent a non-compliance letter from the Enforcement Division.

Darlene

CONTINUOUS COIL PI LING – SLITTING – VOSS LEVELING

P.O. BOX 578
26th AND STATE STREETS
CAGO HEIGHTS, ILLINOIS 60411

TRIEM STEEL & PROCESSING, INC.

PHONE: 312 / 757-6060

January 5, 1981

Director, Enforcement Division
Region V
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604
Attn: Compliance Section

Re: Compliance Order
Docket No. EPA-V-W-81-R-13
Triem Steel & Processing, Inc.
EPA ID No. IL D 020958278

We feel we have complied with the requirements of the above subject Order and the following is a detailed explanation of the steps we have taken to comply with this Order.

1. On December 16, 1980 we submitted a detailed explanation of the steps to be taken to comply with this Order.

2. We have achieved compliance with the following requirements.

   a. The site is entirely isolated by fencing. Danger signs have been installed.

   b. Employee safety and emergency training meeting was held on Monday, January 5, 1980 with all employees working in the Batch Pickling Department (department where the pickling of steel sheets occurs).

   The meeting dealt mainly with the employees' responsibilities and action to be taken in case of an emergency. Present at this meeting were: Clay Wasserott, Plant Manager
   Les Mueller, Department Foreman
   Batch Pickling Department Employees:
   Gary Turbyfill
   Dan Henley
   Andy Patton
   James Graves
   Ken Robinson
   Arey Price
   Dennis Wade
   Andy Stewart
   Charles Hornick
   Charles Harris
   Peter Coleman

b. (continued)

The hooker is the only person normally working on or near the tanks, however, the entire department was instructed so that each person would be informed as to how to handle a problem should one occur. Getting the acid solution (which is a very mild strength) splashed on the skin or even in the eyes is not very dangerous if taken care of and treated at once.

The employees were informed the first step is to rinse the affected area off at once (an industrial eye wash and water spray to wash down with is located on the level with the tanks). The second step is to pour on regular neutralizer from bottles located near the eye wash and water spray station. The third step is to report the occurance to the foreman. If any employee witnesses the accident he is to assist the injured employee and call the foreman at once. The foreman will then take the injured employee to the Company doctor for any further necessary treatment.

Records of this meeting are on file and all future Safety and Emergency Meetings will be recorded.

c. Appropriate arrangements with local emergency response officials have been made. Triem Steel & Processing, Inc. is currently under contract with the local fire department for all emergency calls. Triem Steel has a Company doctor in conjunction with a full-facility medical clinic (Boulevard Medical Clinic), St. James Hospital and Gerardi Ambulance Service and all are within a ten-minute drive of our facility.

3. Please consider this our notification to the U.S. EPA that we have achieved compliance with your Order.

Yours very truly,

TRIEM STEEL & PROCESSING, INC.

Leonard C. Triem

Leonard C. Triem
President

LCT:bp

P.O. BOX 578
26th AND STATE STREETS
CHICAGO HEIGHTS, ILLINOIS 60411

PHONE: 312 / 757-6060

12/22/80

December 16, 1980

Director, Enforcement Division
Region V
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604
Attn: Compliance Section

Re: Compliance Order
Docket No. EPA-V-W-81-R-13
Triem Steel & Processing, Inc.
EPA ID No. IL D 020958278

In reference to the above subject Compliance Order, the following is a detailed explanation of the steps to be taken to comply with this Order.

(2 a.) "The site where hazardous waste materials are stored must be entirely isolated by fencing or other appropriate barrier."

The site has been entirely isolated by fencing as of this date.

"Danger signs must be installed."

Danger signs have been ordered and will promptly be installed upon receipt of same.

(2 b.) "Employee safety and emergency training and recordkeeping of that training must be conducted and maintained."

Employee safety and emergency training has been in process but has never been recorded. At this point we will institute a recordkeeping procedure of our employee safety and emergency training.

Director, Enforcement Division December 16, 1980

(2 c.) "The operator must attempt to make appropriate arrangements with local emergency response officials with respect to the potential need for the services of these organizations."

Triem Steel & Processing, Inc. is currently under contract with the local fire department for all emergency calls. Triem Steel has a Company doctor in conjunction with a full-facility medical clinic (Boulevard Medical Clinic). St. James Hospital and Gerardi Ambulance Service is within a ten-minute drive of our facility.

The foregoing information is our first step in taking corrective action and achieving compliance as specified in the Compliance Order.

Yours very truly,

TRIEM STEEL & PROCESSING, INC.

Leonard C. Triem

Leonard C. Triem
President

LCT:bp

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard Triem, President
Triem Steel and Processing, Inc.
26th and State Street
Post Office Box 578
Chicago Heights, Illinois 60411

DEC 5 1980

Re: Compliance Order
Triem Steel Company
EPA ID No. IL D 020958278

Dear Mr. Triem:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act, as amended, (RCRA) 42 U.S.C. 6901 et seq., based on an inspection of your facility at 26th and State Street Chicago Heights, Illinois, on November 20, 1980. The Compliance Order states the reasons for such a determination, establishes a compliance schedule and assesses civil penalties which are collectible should you fail to meet the time specified in the Order for corrective action. This Compliance Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Compliance Order, a written request for a hearing is required 30 days from receipt of this Compliance Order.

If you have any questions or desire to request an informal conference for purposes of settlement with Enforcement Division staff, please contact Mr. Anthony Holoska, Enforcement Division, Water & Hazardous Materials Enforcement Branch, Engineering Section, 230 South Dearborn Street, Chicago, Illinois 60604. Phone (312) 353-2110.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

Enclosures

cc: Jack Moore, Manager
Hazardous Waste Program
Illinois Environmental Protection Agency

George Wolf
Illinois Attorney Generals Office

bcc: Donaldson, Compliance Section/Rosanne Light, Acting Chief, Compliance Section
Office of Water Enforcement, EN-338

Leder
Holoska
Rosemarin
Cho, A&HMD

AHOLOSKA/dmr 6-67 12-3-80

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:	)	DOCKET NO. EPA-V-W-81-R-13
TRIEM STEEL AND PROCESSING, INCORPORATED EPA ID NO. IL D 020958278	)	FINDINGS OF VIOLATION AND COMPLIANCE ORDER

Pursuant to 42 U.S.C. 6928(a) it has been determined that the above named "person" is in violation of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA). Specifically, it has been determined that Triem Steel and Processing, Incorporated is in violation of regulations promulgated under Subtitle C of RCRA, 42 U.S.C. 6921 et seq., 40 C.F.R. Parts 265.14, 265.16, 265.37, 265.51, 265.73, and 265.403 adopted thereunder.

FINDINGS

1. The facility generates, stores and treats hazardous wastes as defined in 40 C.F.R. 261.31.

2. Pursuant to 40 C.F.R. 265.14 the owner or operator must prevent unknowing entry, and minimize the possibility for unauthorized entry of the site. Danger signs must be posted. The operator was found to be in violation of these requirements, in that there was no fencing and no such signs were posted.

3. Pursuant to 40 C.F.R. 265.16, the owner or operator must conduct specified safety and emergency training and maintain a description and record of such training. The operator was found to be in violation of these requirements, in that no such descriptions and records were available.

4. Pursuant to 40 C.F.R. 265.37, the owner or operator must attempt to make arrangements, as appropriate, with local police, fire departments, and other emergency response agencies for response to emergencies at the facility. The operator did not have any such arrangements made and thus is in violation, based on information obtained during the inspection.

5. Pursuant to 40 C.F.R. 265.51, each owner or operator must have a contingency plan for his facility. The operator was found to be in violation in that a written contingency plan could not be produced at the time of the inspection.

6. Pursuant to 40 C.F.R. 265.73, the owner or operator must keep a written operating record at his facility. The operator was found to be in violation in that a written operating record could not be produced at the time of the inspection.

7. Pursuant to 40 C.F.R. 265.403, the owner or operator must, on a regular basis, inspect the treatment facility. The operator was found to be in violation in that there was no indication that such inspections were regularly conducted.

8. The State of Illinois duly authorized officials have been notified of the above described violations prior to the issuance of this Compliance Order.

ORDER

It is hereby ordered that Triem Steel and Processing, Incorporated take the following corrective actions within the specified times for achieving compliance with Subtitle C of RCRA, 42 U.S.C. 6921 et seq., 40 C.F.R. Parts 265.14, 265.16, 265.37, 265.51, and 265.403.

1. The operator shall submit to the Director, Enforcement Division, Region V, United States Environmental Protection Agency, Attention: Compliance Section, at 230 South Dearborn Street, Chicago, Illinois 60604, within 15 days of receipt of this Order a written detailed explanation of the steps to be taken to comply with this Order.

2. The operator, within 30 days of receipt of this Order, shall achiev compliance with the following requirements.

a. The site where hazardous waste materials are stored must be entirely isolated by fencing or other appropriate barrier. Danger signs must be installed.

b. Employee safety and emergency training and recordkeeping of that training must be conducted and maintained.

c. The operator must attempt to make appropriate arrangements with local emergency response officials with respect to the potential need for the services of these organizations.

3. The owner/operator must notify the U.S. EPA in writing upon achieving compliance with this Order.

A civil penalty of $1000.00 (One Thousand Dollars) is assessed for each day of noncompliance with the dates specified for taking corrective action, and achieving compliance as specified in this Order.

This Order is entered this 5th day of December, 1980.

NOTICE OF OPPORTUNITY FOR HEARING

The above named person is hereby notified that the above Order shall become final unless said person has requested in writing a public hearing on the Order no later than 30 days from the date this Order is served. Please address any such request to Director, Enforcement Division, Region V, United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604. Should a hearing be requested within the specified time, a hearing will be promptly conducted.

Dated this 5th day of December, 1980.

John McGuire, Regional Administrator
U.S. Environmental Protection Agency
Region V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF: Triem Steel and Processing, Inc., an Illinois corporation RESPONDENT 26th and State Streets Chicago Heights, Illinois 60411 ID Number: ILD 001744572	)	DOCKET NO. COMPLAINT AND FINDINGS OF VIOLATION

COMPLAINT

This complaint is issued pursuant to Section 3008(a) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. Sec. 6928, and is equivalent to a Compliance Order referred to in that Section. The Complainant is the Regional Administrator, Region V, United States Environmental Protection Agency (U.S. EPA). Based upon information and records maintained by U.S. EPA and Illinois EPA, it has been determined that the above-named Respondent is in violation of RCRA. Specifically, it has been determined the Respondent is in violation of Subtitle C of RCRA, Section 3004(6) (42 U.S.C. Sec. 6924) and regulations 40 CFR Sec. 265.143, as embodied in 35 Ill. Adm. Code Sections 725.240(a) and 725.243.

FINDINGS

This determination is based on the following findings of violation:

1. Pursuant to 35 Ill. Adm. Code 725.240(a) (40 CFR 265.140(a)), certain hazardous waste facilities must file and comply with the financial assurance provisions of 35 Ill. Adm. Code 725.243 (40 CFR 265.143).

2. Respondent is a hazardous waste facility that is required to comply with the financial assurance provisions of 35 Ill. Adm. Code 725.240(a) (40 CFR 265.140(a)), and 35 Ill. Adm. Code 725.243 (40 CFR 265.143).

3. Respondent had been specifically notified by Certified Letter dated July 28, 1983 of the applicability upon Respondent of the financial assurance responsibility requirements specified at 35 Ill. Adm. Code 725.243 (40 CFR 265.143).

4. Up to and including the date of this Complaint and Findings of Violation, Respondent has refused or failed to comply with the financial assurance requirements of 35 Ill. Adm. Code 725.243 (40 CFR 265.143) and is therefore in violation of Subtitle C of RCRA.

ORDER

IT IS HEREBY ORDERED that Respondent take the following corrective action:

1. Respondent shall, within forty-five (45) days of receipt of this Complaint and Order, provide the Illinois Environmental Protection Agency and the Uunited States Environmental Protection Agency, Region V, with proof of compliance with all financial assurance requirements pursuant to Ill. Adm. Code 725.243 (40 CFR 265.143).

2. Respondent shall provide such proof of financial assurance requirements on forms approved by the Illinois Environmental Protection Agency and which must be accompanied by any other necessary documentation.

3. A civil penalty of $ is assessed for the violation set forth in Findings above.

Respondent is hereby notified that the above Order shall become final unless Respondent has requested in writing a public hearing on the Order, no later than thirty (30) days from the date this Order is served. Respondent has the right to request a hearing to contest any factual allegation set forth in the Complaint or the appropriateness of the proposed penalty and compliance schedule set forth in the Order. In the event Respondent elects to request a hearing, and to avoid having the hereinabove Compliance Order become final without further proceedings, Respondent must file a written answer of the Complaint with the Regional Hearing Clerk, United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from the date this Complaint and Order is served. A copy of any written answer to the Complaint and any subsequent document filed in this action should <u>also</u> be sent to the Waste Management Division, Attention: Waste Management Branch; Technical, Permits and Compliance Section, at the same address. Such answer must clearly and directly admit, deny or explain.

Request for an informal conference or service of documents should be made to at the above-named address, telephone number (312) .

Signed this _____ day of _____, 1984

_____

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

BGC:BS:st:sp426d-427d

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

This did not go out because we wanted to be able to show it was exempt

Leonard C. Triem, President
Triem Steel and Processing, Inc.
25th and State Streets
P.O. Box 578
Chicago Heights, Illinois 60411

Re: Consent Agreement
Triem Steel Company
Docket No. EPA-V-W-81-R-13

Dear Mr. Triem:

Per your conversation with Mr. Carey S. Rosemarin on January 19, 1981, please find the enclosed copy of the applicable regulations and an original and one copy of a Consent Agreement and Final Order regarding the above-referenced case. Please execute the original and copy and forward them to this office within one week from receipt of this letter. It is important that the signed document be returned to this office within this time frame. Upon our receipt of the executed Consent Agreement, a fully executed copy will be returned to you for your files.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: Jack Moore, Manager
Hazardous Waste Program
Illinois Environmental Protection
Agency

George Wolff
Illinois Attorney General's
Office

bcc: Region V, Compliance Unit, Donaldson/David N. Lyons, Chief, Compliance Unit, Office of Water Enforcement (EN-338)

Leder
Holoska
Cho, A&HMD

5EWHME:3/5/81
CSROSEMARIN:bb:6-6740

WALKER

GRIMES

SCHULTEIS

HOLOSKA

MINER

GROMNICKI

FENNER

BRYSON

GARDEBRING

5EWNNE

Mr. Leonard C. Triem, President
Triem Steel and Processing, Inc.
26th and State Street
P.O. Box 578
Chicago Heights, Illinois 60411

Re: Consent Agreement
Triem Steel Company
Docket No. EPA-V-W-81-R-13

Dear Mr. Triem:

Per your conversation with Mr. Carey Rosemarin on January 19, please find the enclosed copy of the applicable regulations, and an original and one copy of a Consent Agreement and Final Order regarding the above-referenced case. Please execute the original and copy, and forward them to this office within one week from receipt of this letter. It is important that the signed document be returned to this office within this time frame.

Upon our receipt of the executed Consent Agreement, a fully executed copy will be returned to you for your file.

Very truly yours,

Sandra S. Gardebring
Enforcement Division

Enclosure

bcc: Leder
Donaldson/David N. Lyons
Chicago, State Implementation Officer

EAL 2/25/81

AHH 2/24

CVR 2/11/81 2/25/81

C ROSEMARIN:dp:2/6/81
6-6740

WALKER

GRIMES

GROMNICKI 2/3

FENNER

BRYSON

GARDEBRING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:	)	DOCKET NO. EPA-V-W-81-R-13
	)	
	)	CONSENT AGREEMENT
TRIEM STEEL AND PROCESSING, INCORPORATED	)	AND FINAL ORDER
	)	
EPA I.D. NO. IL D 020958278	)	

AGREEMENT

WHEREAS,

1. This administrative proceeding was initiated pursuant to Section 3008 of the Resource Conservation and Recovery Act, as amended (42 U.S.C. 6901 et seq.), hereinafter RCRA.

2. This action was instituted by a Complaint and Notice of Opportunity for Hearing by Complainant on December 5, 1980, charging that Respondent was in violation of Subtitle C of RCRA, and regulations 40 CFR §§265.14, 265.16, 265.37, 265.51, 265.73, and 265.403, adopted thereunder. These violations occurred at Respondent's facility located at 26th and State Street, Chicago Heights, Illinois 60411. They were observed by officials of the United States Environmental Protection Agency (U.S. EPA) during an inspection of the facility on November 20, 1980.

3. The parties discussed settlement of this action on the telephone on January 19, 1981; through Mr. Carey S. Rosemarin, an attorney for U.S. EPA and Mr. Leonard Triem, President of Triem Steel and Processing, Inc., and Mr. Clayton Wasserott, Plant Manager of that corporation.

WHEREFORE, for the purpose of this proceeding only, and without prejudice to any other proceeding:

1. Respondent Triem Steel and Processing, Incorporated hereby admits the jurisdictional allegations contained in the Complaint.

2. Respondent admits the allegations set forth in the Complaint.

3. Respondent explicitly waives its right to request a hearing on the allegations of the Complaint filed herein.

4. The parties stipulate that during the said settlement conference, and in a letter sent to U.S. EPA by Leonard Triem on January 5, 1981, Leonard Triem and Clayton Wasserott represented that:

a. The site is entirely isolated by fencing and danger signs have been installed.

b. Employee safety and emergency training has commenced.

c. Arrangements with local emergency response officials have been made.

5. Respondent consents to the issuance of the Final Order hereinafter recited.

ORDER

The Respondent Triem Steel and Processing, Inc. shall, effective immediately, unless otherwise stated, comply with the following requirements:

a. All applicable requirements of 40 CFR 265.14 shall be complied with within thirty days of receipt of this Agreement.

b. All applicable requirements of 40 CFR 265.16 shall be complied with within thirty days of receipt of this Agreement.

c. All applicable requirements of 40 CFR 265.37 shall be complied with within thirty days of receipt of this Agreement.

d. Respondent shall prepare and submit a contingency plan for the facility pursuant to 40 CFR 265.51, and shall comply with all other applicable parts of 40 CFR 265 Subpart D, within thirty days of receipt of this Agreement.

e. Respondent shall prepare, submit, and maintain an operating record for the facility pursuant to 40 CFR 265.73 within thirty days of receipt of this Agreement.

f. Respondent shall immediately commence a program of inspections in compliance with 40 CFR 265.403, and 265.15.

g. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order, or any part thereof, and submit all documents written pursuant to this Order.

A civil penalty of $1,000.00 (ONE THOUSAND DOLLARS) is assessed for each day of noncompliance with the dates specified for taking corrective action, and achieving compliance as specified in this Order.

The above Order is hereby consented to by both of the parties to this proceeding.

_____
Leonard C. Triem, President
Triem Steel and Processing Inc.

Dated: _____ At: _____

_____
Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dated: _____ At: _____

Therefore, it is so ordered. This order shall become effective immediately.

_____
Valdas V. Adamkas
Acting Regional Administrator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dated: _____ At: _____

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard Triem, President
Triem Steel and Processing, Inc.
26th and State Street
Post Office Box 578
Chicago Heights, Illinois 60411

Re: Compliance Order
Triem Steel Company
EPA ID No. IL D 020958278

Dear Mr. Triem:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act, as amended, (RCRA) 42 U.S.C. 6901 et seq., based on an inspection of your facility at 26th and State Street Chicago Heights, Illinois, on November 20, 1980. The Compliance Order states the reasons for such a determination, establishes a compliance schedule and assesses civil penalties which are collectible should you fail to meet the time specified in the Order for corrective action. This Compliance Order is issued pursuant of Section 3008 of RCRA (42 U.S.C. 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Compliance Order, a written request for a hearing is required 30 days from receipt of this Compliance Order.

If you have any questions or desire to request an informal conference for purposes of settlement with Enforcement Division staff, please contact Mr. Anthony Holoska, Enforcement Division, Water & Hazardous Materials Enforcement Branch, Engineering Section, 230 South Dearborn Street, Chicago, Illinois 60604. Phone (312) 353-2110.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

Enclosures

cc: Jack Moore, Manager
Hazardous Waste Program
Illinois Environmental Protection Agency

George Wolff
Illinois Attorney Generals Office

bcc: Donaldson, Compliance Section/Rosanne Light, Acting Chief, Compliance Section
Office of Water Enforcement, EN-338

Leder
Holoska
Rosemarin
Cho, A&HMD

AHOLOSKA/dmr 6-67 12-3-80

ILD020958278
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: Triem ~~Industrial Building~~ Steel

(B) Street: 26th and State PO Box 578

(C) City: Chicago Heights (D) State: Ill (E) Zip Code: 60411

(F) Phone: 757-6060 (G) County: Cook

(H) Operator: Clayton Wasserott

(I) Street: 26th and State P.O. Box 578

(J) City: Chicago Heights (K) State: Ill (L) Zip Code: _____

(M) Phone: 757 6060 (N) County: Cook

(O) Owner: Leonard Triem

(P) Street: 26th and State

(Q) City: Chicago Heights (R) State: Ill (S) Zip Code: _____

(T) Phone: _____ (U) County: Cook

(V) Type of Ownership: ___ Federal ___ Municipal X Private ___ State ___ County

(W) Date of Inspection: 11/20/80 (Q) Time of Inspection (From) 2:35 (To) _____

(X) Weather Conditions: Sunny, cold

W. Va. Fax

(Y) Person(s) Interviewed	Title	Telephone
Clayton Wasserett	Plant Manager	757-6060

(Z) Inspection Participants	Title	Telephone
Eugene Meyer	Chemist	886-6147
Erin Madan	Physical Scientist	886-6254
Tony Holecka	Env. Engineer	353-2110
Brad Benning	Env. Engineer	395-9780

II. Description of Site Activity

(A) X Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) X Chemical, Physical and Biological Treatment (Form 4)

(D) X Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	X			

I . GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		
2. Transfer of Ownership?		X		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		X		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		X		
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	X			
2. Artificial or Natural Barrier Around Facility?		X		
3. Controlled Entry?	X			
4. Danger Sign(s) at Entrance?		X		
(D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?		X		
2. Records of Operator Error?		X		
3. Records of Discharges?		X		
4. Inspection Schedule?		X		
5. Safety, Emergency Equipment?	X	X		
6. Security Devices?		X		
7. Operating and Structural Devices?		X		
8. Inspection Log?		X		

11/1/80

III. GEN AL FACILITY STANDARDS - Contin

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?	X			
2. Description of Training?		X		
3. Records of Training?		X		
Is Personnel Training Completed within the Required Time Frame?		X		
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?	NA			
1. Special Handling?				
2. No Smoking Signs?				
3. Separation and Confinement?				

IV. PREPAREDNESS AND PREVENTION

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?				
(B) Does the Facility have the Following Equipment:				
1. Alarm System?		X		
2. Telephone or 2-Way Radios?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control;

Units: Building does not burn

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System	NA			
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?				
2. Are records of past shipments retained for 3 years?				
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?				
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?		X		
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?		X		

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?				
2. Has this plan been submitted to the Regional Administrator?				
3. Has Closure begun?				
4. Is closure cost estimate available by May 19, 1981?				
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?				

11/c /G3

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?				
A. Do Personnel training records include:				
1. Job Titles?	X			
2. Description of Training?		X		
3. Records of Training?		X		
Is Personnel Training Completed within the Requried Time Frame?		X		
B. Prepardness and Prevention 265 Subp C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				
2. Does the Facility have the following equipment?				
a. Alarm system?		X		
b. Telephone or 2-Way Radios?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control

Units: _____

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	X			
b. Is emergency equipment Maintained in Operable Condition?	X			

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?		X		
5. Is there adequate Aisle Space for unobstructed Movement?	NA			
6. Are arrangements with local authorities included in the operating record?		X		

(C) Contingency Plan and Emergency *pts Subp D*
Procedure

1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 264.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)		X		
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?		X		
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.		X		
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?		X		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.		X		

ILD 020952278
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

I. General Information:

(A) Installation Name: Trem Steel

(B) Street: ~~2060~~ 26th & State ; PO Box 578

(C) City: Chgo Hts. (D) State: IL (E) Zip Code: 60411

(F) Phone: 757-6060 (G) County: Cook

(H) Operator: Clayton Wasserott

(I) Street: 2060 State PO Box

(J) City: Chgo Hts (K) State: IL (L) Zip Code: ____

(M) Phone: 757-6060 (N) County: Cook

(O) Owner: Leonard Trem

(P) Street: 2060 State St. PO Box 578

(Q) City: Chgo. Hts. (R) State: IL (S) Zip Code: ____

(T) Phone: 757-6060 (U) County: Cook

(V) Type of Ownership: ____ Federal ____ Municipal X Private ____ State ____ County

(W) Date of Inspection: 11/20/80 Time of Inspection (From) ____ (To) ____

(X) Weather Conditions: cold, sunny

(Y) Person(s) Interviewed	Title	Telephone
Clayton Wassercatte	operator-plant manager	757-6060

(Z) Inspection Participants	Title	Telephone
Brad Benning	environ specialist	345-9780
Tony Holecka	environ engineer	353-2110
Eugene Meyer	Chemist	886-6147
Erin Moran	physical scientist	886-6254

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ____ Transporter (Form 3)

(B) X Chemical, Physical and Biological Treatment (Form 4)

(C) X Storage (Form 5)

(D) ____ Landfill (Form 6)

(E) ____ Incineration (Form 7)

(F) ____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?		NA		
(B) Does the Manifest contain the following information:				
1. Manifest document number?		NA		
2. Name, mailing address, telephone number, and EPA ID Number of Generator?		NA		
3. Name and EPA ID Number of Transporter(s)?		NA		
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?		NA		
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?		NA		
6. The total quantity of waste(s) and the type and number of containers loaded?		NA		
7. Required Certification?		NA		
8. Required Signatures?		NA		
(C) Does the Owner or Operator Submit Exception Reports when Needed?		NA		

IV. PRE-TRANSPORT REQUIREMENTS

	Yes	No	Not Inspected	See Remark Number
(A) Is Generator Packaging waste in accordance with DOT Regulations?	X	NA		
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	X	NA		
(C) If required, are placards available to transporter?		NA		

	Yes	No	Not Inspected	See Remark Number
(D) Pre-shipment Accumulation:		NA		
1. Are containers marked with start of accumulation date?				
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		NA		
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?		NA		
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	X	~~NA~~		
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X	~~NA~~		
c. Do continuous feed systems have a waste-feed cutoff?	X	~~NA~~		
d. Are required daily and weekly inspections done?		X		
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requi em nts?	X			
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	X			

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?				
A. Do Personnel training records include:				
1. Job Titles?	X			
2. Description of Training?	X			
3. Records of Training?	X	X		
Is Personnel Training Completed within the Requried Time Frame?		X		
B. Prepardness and Prevention				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
2. Does the Facility have the following equipment?				
a. Alarm system?	X			
b. Telephone or 2-Way Radios?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control

Units: unlimited

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	X			
b. Is emergency equipment Maintained in Operable Condition?	X			

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?		X		
5. Is there adequate Aisle Space for unobstructed Movement?	NA.			
6. Are arrangements with local authorities included in the operating record?		X		

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)		X		
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?		X		
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.		X		
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?		X		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.		X		

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?		X		
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?		X		
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?		X		
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		X		
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?		X		

V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?		X		

VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?		X		
(If A was answered Yes, then complete one or both of the following)				
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements?	____	N.A.	____	____
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?	____	N.A.	____	____

VII. PREPARER INFORMATION

Name: Erin Moran

Title: Physical Scientist

Phone Number: 886-6254

REMARKS:

ILD020958278
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: Triem Steel

(B) Street: 26th and State PO Box 578

(C) City: Chicago Heights (D) State: Il (E) ZIP Code 60411

(F) Date of Inspection: 757-6060

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I) No

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?				
2. Are containers compatible with waste in them?				
3. Are containers stored closed?				
4. Are containers managed to prevent leaks?				
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?				
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				
B. Facilities which store hazardous waste in tanks (Subpart J)				
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				3
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?		NA		

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?	X			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				1
5. Are required daily and weekly inspections done?		X		
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	NA			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	NA			
C. Facilities which store hazardous waste in surface impoundments (Subpart K)				
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	X			
2. Do earthen dikes have protective cover?	NA			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				1
4. Is the freeboard level inspected at least daily?				2
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				2
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	NA			12
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	NA			12
D. Facilities which store hazardous waste in waste piles (Subpart L)				
1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

1. Just starting
2. Not yet operable
3. Buried - cannot observe

EPA IDENTIFICATION NUMBER
ILD 020958278

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment

I. General Information

(A) Facility Name: Triem Steel

(B) Street: 26th and State PO Box 578

(C) City: Chicago Heights (D) State: Ill (E) Zip Code 60411

(F) Phone: 757 6060 (G) County: Cook

II. Chemical, Physical and Biological Treatment (Subpart Q)

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	X			
3. Has the owner or operator addressed the waste analysis requirements of 265.402?		X		1
4. Are inspection procedures followed according to 265.403?		X		
5. Are the special requirements fulfilled for ignitable or reactive wastes?	NA			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	NA			

III. Land Treatment (Subpart M)

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation?				
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?				
3. Is waste analysis according to 265.273?				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility?				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.)				

1. Just starting to analyze samples.

D. Corrective Action

YE

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Rick Hersemann
Date: September 22, 1992

Background Facility Information

Facility Name: Marias Industries, Inc./Triem Steel
EPA Identification No.: ILD 001 744 572
Location (City, State): Chicago Heights, IL
Facility Priority Rank: Moderate

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

The entire facility, which includes 3 SWMUs formerly operated by Triem Steel.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
( ) Enforcement order
(X) Other (Explain)

No corrective action activities have been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway
(X) Not required

Additional explanatory notes:

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

   (X) Ground water
   (X) Surface water
   ( ) Air
   (X) Soils

6. Are contaminant releases migrating off-site?

   ( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:
Surface water:
Air:
Soils:

   ( ) No
   (X) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

   ( ) Yes (Go to 8a)
   ( ) No
   (X) Uncertain

   Additional explanatory notes:

Access to the 45 acre landfill (SWMU 1) is only partially restricted.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

   (X) Yes
   ( ) No
   ( ) Uncertain

   Additional explanatory notes:

Contaminated ground water from the landfill could migrate to Deer Creek or drinking water wells 1/2 mile south of the facility.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

   ( ) Yes (Go to 9)
   ( ) No
   (X) Uncertain

   Additional explanatory notes:

No sampling data is available for Deer Creek or ground water in the immediate area of the landfill.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

   (X) Yes
   ( ) No
   ( ) Uncertain

   Additional explanatory notes:

Contaminated ground water could migrate to Deer Creek or nearby drinking water wells.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

No final corrective measures have been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Fencing around the landfill could restrict human access.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

(X) Solid
(X) Light non-aqueous phase liquids (LNAPLs)
(X) Dense non-aqueous phase liquids (DNAPLs)
(X) Dissolved in ground water or surface water
(X) Gaseous
( ) Other _____

13. Which of the following major chemical groupings are of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
( ) Polynuclear aromatics (PAHs)
( ) Pesticides
( ) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
(X) Inorganics and metals
( ) Explosives
( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

Fencing around the landfill would restrict human access. Further investigation is required to determine the extent of ground-water contamination from the landfill.

( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
(X) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

(X) Yes
( ) No, not feasible
( ) No, not required
(X) Further investigation necessary

Explain final decision, using additional sheets if necessary.

Fencing around the 45-acre landfill would restrict human access. Further investigation is necessary to determine the extent of ground-water contamination from the facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

September 10, 1993

Daniel J. Marias
Marias Industries
2710 State Street
Chicago Heights, IL 60411

Re: Visual Site Inspection
Marias Industries, Inc.
Formerly Triem Steel and Processing, Inc.
Chicago Heights, Illinois
ILD 001 744 572

Dear Mr. Marias:

As indicated in the letter of introduction sent to you on May 20, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kenneth S. Bardo

for Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 15, 1992

Marias Industries
c/o Mr. Tom Cephali
P.O. Box 13206
Scottsdale, AZ 85267

Re: Visual Site Inspection
Marias Industries, Inc.
Formerly Triem Steel and Processing, Inc.
Chicago Heights, Illinois
ILD 001 744 572

Dear Mr. Cephali:

As indicated in the letter of introduction sent to you on May 20, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

NP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 20, 1992

HRE-8J

Marias Industries
c/o Tom Cephali
P.O. 13206
Scottsdale, AZ 85267

Re: Visual Site Inspection
Triem Steel & Processing Inc.
Chicago Heights, IL
ILD 001 744 572

Dear Tom Cephali:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104 (e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs), and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment 1. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs

of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for May 29, 1992 at 9:00 am. The inspection team will consist of personnel of B&V Waste Science & Technology Corp., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francine Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francine M. Harris

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Attachment

cc: Larry Eastep, IEPA, Springfield
Gliff Gould, IEPA, Maywood

mas/rfa

ATTACHMENT 1

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

MARIAS INDUSTRIES, INC. FORMERLY TRIEM STEEL AND PROCESSING, INC. CHICAGO HEIGHTS, ILLINOIS ILD 001 744 572

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 001 744 572
Date Prepared	:	October 21, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL3C
Prepared by	:	B&V Waste Science and Technology Corp. (Mitchell P. Balek and Timothy J. Moody)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Marias Industries, Inc. (Marias Industries) facility in Chicago Heights, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

While conducting this PA/VSI, BVWST originally identified three SWMUs at the former Triem Steel and Processing, Inc. (Triem Steel) facility. The former Triem Steel facility occupied approximately 80 acres. The three SWMUs included a 45-acre landfill that received municipal waste from 1929 through 1947 and industrial waste from 1947 until 1977; and a lagoon that received spent pickle liquor from 1947 until early 1980 when a third SWMU, a concrete tank used to manage and treat spent pickle liquor (K062), was apparently constructed at the same location as the lagoon. Neither of these SWMUs is located on the property which is occupied by the current owner and operator of the facility and holder of EPA Identification Number ILD 001 744 572, Marias Industries. Marias Industries occupies 11.56 acres of the former 80-acre site. Before the property was purchased by Marias Industries, IEPA acknowledged that Marias Industries had no involvement with the Landfill (SWMU 1) north of Marias Industries.

Marias Industries receives, temporarily stores, and transloads various heavy, bulky products onto rail cars and trucks for distribution throughout the United States. Marias Industries does not manufacture or produce materials, products, or hazardous waste. The facility, which has operated at its current location since 1987, is not a RCRA regulated facility, even though it holds the original EPA Identification number.

The Marias Industries facility, which occupies 11.56 acres of what was once an approximately 80-acre site in a mixed-use area, employs about 30 people. Marias Industries discharges its surface runoff water to an open concrete tank, located approximately 400 feet west of its property line. The owner of the property containing the tank is unknown.

The National Brick Company owned the original 80-acre site and excavated clay on 45 of the 80 acres. From about 1929 until 1947, this 45-acre area was used as a municipal waste dump site (landfill) for approximately 20 surrounding communities.

In 1947, Triem Steel and Processing, Inc. (Triem Steel), purchased the approximately 80-acre site. Triem Steel stored, sheared, roller leveled, coil cut, and pickled steel mill products. Triem Steel also operated the 45-acre landfill until it was capped with a 2-foot layer of clay and closed on May 28, 1977.

Triem Steel had regulatory status as a generator and as treatment, storage, and disposal (TSD) facility. Steel processing operations generated spent pickle liquor (K062), which was emptied from former pickling tanks into the open concrete tank by a closed system of underground 12-inch pipes. As suspended solids and sludge settled, the oily residue floating on the surface was skimmed back with a rubber-like flap. No documentation was found of the resulting sludge and oil wastes being sent offsite for disposal. In 1982, Triem Steel had its regulatory status changed to a "totally enclosed" treatment facility, which means it did not operate any hazardous waste management units that required a permit. This change in status may have been incorrect. Triem Steel filed for bankruptcy in 1983.

BVWST personnel discovered conflicting documentation about the ownership of the 80 acres that includes the Marias Industries facility. First, according to Illinois Environmental Protection Agency (IEPA) documentation, North American Enterprises, Inc., purchased the 80 acres from the secured assets of Triem Steel in August 1983. However, other documents state the National Acceptance Corporation acquired the 80 acres from the secured assets of Triem Steel in 1983 (WCC, 1991). Second, an IEPA document states the landfill portion of the 80 acres was transferred to Bloom Township on January 1, 1985. This conflicts with documents that state the Weiss-Ernst Partnership acquired the 80 acres from the National Acceptance Corporation on August 18, 1983, and then on December 28, 1983, donated most of the 80 acres, excluding the 11.56 acres of the southeastern part of the property, to Bloom Township (WCC, 1991).

A.B.G.M., Inc., acquired the property from Bloom Township on March 13, 1986 (WCC, 1991). JM2, Inc., acquired the property from A.B.G.M., Inc., on January 5, 1988 (WCC, 1991).

During the VSI, BVWST personnel were given documentation by Marias Industries representatives that states Four M Steel, a structural steel fabricator, obtained a lease with an option to acquire the former Triem Steel property in 1984. The lessor/owner at the time was represented in the lease as Chicago Heights Properties, Inc. (Marias, 1992a). No other information was available regarding Chicago Heights Properties, Inc.

In 1984, Four M Steel leased a portion of the former Triem Steel property. Four M Steel fabricated steel and provided storage for steel products; it had no processing operations except

cutting and welding. Marias Industries personnel believe Four M Steel went bankrupt sometime between 1989 and 1990.

In 1987, Marias Industries entered into a lease with the option to acquire the 11.56 acres of the Four M Steel site from Weiss-Ernest Partnership, the successor to Chicago Heights Properties, Inc. Marias Industries began its storage and distribution operations at this time. Later in 1987, Marias Industries purchased the 11.56 acres it now occupies.

Ground water is used only as a washup and sanitary water supply. The nearest drinking-water well is located approximately 3,000 feet south of Marias Industries. Bottled water is used for drinking water at the facility.

Sensitive environments are not located onsite. The nearest wetland area, which is approximately 18 acres, is located approximately 400 feet south of the facility.

Facility access is controlled by an alarm system for all buildings. Fencing runs along the eastern border and part of the southern border. A gate on the eastern side of the facility secures the State Street entrance.

The nearest surface-water body, Deer Creek, is located approximately one mile east of the facility and is used for recreational purposes.

The PA/VSI identified no SWMUs or AOCs at the 11.56-acre facility owned and operated by Marias Industries.

The PA/VSI identified three SWMUs on the original 80 acre facility formerly occupied by Triem Steel.

1. Landfill
2. Open Concrete Tank
3. Former Lagoon

The Landfill (SWMU 1) operated as a municipal landfill from 1929 to 1977. The Landfill (SWMU 1) managed municipal wastes consisting of garbage, putrescible waste, demolition material, combustible material, and paper. From 1947 to 1977 Triem Steel operated the Landfill (SWMU 1) and disposed of industrial wastes consisting of oily waste, sludge, and spent pickle liquor which was sprayed on the Landfill (SWMU 1) for rodent control. A release to ground water and onsite soils from the Landfill (SWMU 1) is a high possibility. A release to the air and surface water is a moderate to high possibility. Contaminated ground water may have discharged to Deer Creek,

approximately one mile east of the facility. Decaying wastes in the landfill would have created methane gas. No information was available concerning vents on the landfill. BVWST recommends EPA conduct further investigations to determine the owners of the property where SWMU 1 is located.

The Open Concrete Tank (SWMU 2) may contain sludge. The potential for release to the air is low. The potential for release to ground water, surface water, and on-site soils is moderate. This unit does not have a concrete bottom, and sludge may be present if this unit overflows. BVWST recommends that more research be done on the history of this unit and current ownership of property.

The potential for release to air from the Former Lagoon (SWMU 3) is low. The potential for release to ground water, surface water, and on-site soils is moderate to high . There were no release controls for the spent pickle liquor (K062). This could have easily leaked to ground water, surface water, and on-site soils. BVWST recommends that more research be done on the history of this unit and current ownership of property.

BVWST recommends more research be done to determine the owner of the property west of Marias Industries. Available documentation conflicted and BVWST was unable to determine past ownership of this property. Also, BVWST recommends a thorough investigation of records to determine if the sludge and oil wastes were sent offsite for disposal. If sludge and oil wastes were not sent offsite for disposal, the bottom of the open concrete tank should be sampled.

1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. As a team member with PRC under the TES 9 contract, B&V Waste Science and Technology Corp. (BVWST) conducted the PA/VSI for the Marias Industries facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; initially identifying potential sampling parameters and locations, if needed; and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Marias Industries, Inc. (Marias Industries) facility (EPA Identification No. ILD 001 744 572) in Chicago Heights, Cook County, Illinois. The PA was completed on May 28, 1992. BVWST gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional sources of information include the National Wetlands Inventory (NWI), the National Weather Bureau (NWB), United States Geological Survey (USGS) Topographic maps, the United States Department of Agriculture (USDA), and the Federal Emergency Management Agency (FEMA). The VSI was conducted on May 29, 1992. It included interviews with Marias Industries facility representatives and a walk-through facility inspection. BVWST identified three SWMUs at the facility.

BVWST completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized in Attachment B. Field notes from the VSI are included in Attachment C. Drinking-water analysis results are included in Attachment D. A letter to Marias Industries from IEPA acknowledging that Marias Industries has no involvement with the Triem Steel Landfill is included in Attachment E. Results from chemical analysis on the sludge is included in Attachment F.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Marias Industries facility is located at 2710 State Street in Chicago Heights, Cook County, Illinois (latitude 41° 29' 00" N and longitude 87° 38' 15" W), as shown in Figure 1. The facility occupies 11.56 acres in a mixed-use area.

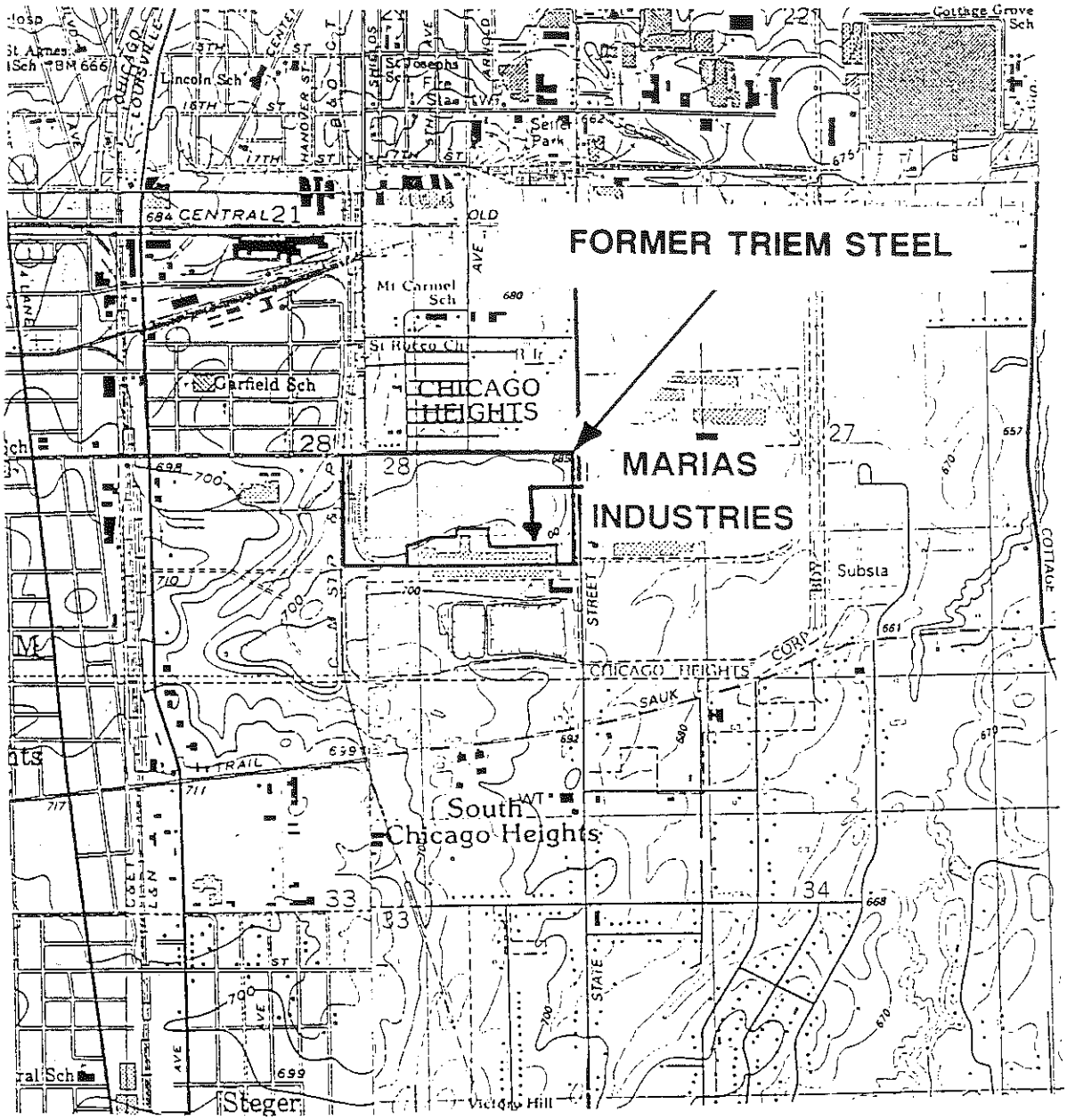
The Marias Industries facility is bordered on the north by the Triem Steel landfill (landfill); on the west by railroad tracks and vacant land containing an open concrete tank and a former lagoon; on the south by railroad tracks; and on the east, across State Street, by Trinity Steel.

2.2 FACILITY OPERATIONS

Marias Industries is a privately owned company, which established its current location in 1987. Marias Industries stores and transloads steel, lumber, and building products. Steel products include beams, coils, rods, and bars. Lumber products include plywood and timber. Building products include topsoil, bark, drywall, and peat moss. Marias Industries transloads these products for distributors throughout the United States. It does not manufacture or generate products or materials.

Marias Industries employs approximately 30 people. Its facility consists of five buildings. The first building is called Plant 1 and is approximately 60,000 square feet. The second building is called Plant 2 and is approximately 30,000 square feet. The third building is called Plant 3 and is approximately 20,000 square feet. The fourth building is an office that is approximately 1,200 square feet. The fifth building is a maintenance building and is approximately 4,000 square feet.

Before the property was purchased by Marias Industries, IEPA acknowledged that Marias Industries had no involvement with the Landfill (SWMU 1) north of Marias Industries. Attachment E contains IEPA's statement to this effect.



1 .5 0 KILOMETERS 1 2
1000 0 METERS 1000 2000

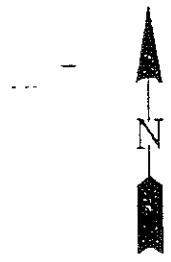
1 .5 0 1
MILES

1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10 000
FEET

CONTOUR INTERVAL 10 FEET

QUADRANGLE LOCATION

Source: Modified from U.S.G.S.
Dyer, IL Topo Map, 7.5min Series



Not to Scale

Marias Industries
Chicago Heights, Illinois
PA/VSI

FIGURE 1
FACILITY LOCATION

WASTE SCIENCES AND TECHNOLOGY CORP.

Railroad tracks run east-west, outside the southern border of the facility. Rail cars come onto facility property from the west to either deliver or pick up material. When rail cars deliver material, mobile cranes unload the material onto facility property or trucks for local delivery. If material is temporarily stored at the facility, it remains in one of three plant warehouses or outdoors at the western end of the facility. Material remains at the site until it is picked up by truck or rail car for delivery to distributors.

The Marias Industries facility occupies 11.56 acres of what was once an approximately 80-acre site. The facility has EPA Identification No. ILD 001 744 572. This number was assigned to the property under Triem Steel's ownership and stays with the property even if it is sold. Although Marias Industries does not generate or store hazardous waste, the facility maintains the EPA Identification number assigned to the property.

The 80-acre site was purchased on July 14, 1905, by the National Brick Company. The brick company used 45 of the 80 acres for clay excavation. The company's buildings occupied the southeastern portion of the 80 acres. Brick manufacturing operations were abandoned in about 1920 (WCC, 1991). Beginning in about 1929, the 45-acre area used to excavate clay became a garbage dump (IEPA, 1992), referred to as the Landfill (SWMU 1). No information was available regarding use of the land from 1920 to 1929. The landfill was used as a dump for approximately 20 surrounding communities from about 1929 to 1947 (WCC, 1991).

In 1947, Triem Steel and Processing, Inc. (Triem Steel), purchased the 80-acre site. Triem Steel stored, sheared, roller leveled, coil cut, and pickled steel mill products. The facility purchased steel from mills and sold it to manufacturers and fabricators (Triem Steel, 1980b). Triem Steel operated the Landfill (SWMU 1) until it was capped with a 2-foot layer of clay and closed on May 28, 1977 (IEPA, 1985). Further information regarding the cap could not be obtained.

Triem Steel continued steel processing operations on the site, which included the 11.56 acres currently occupied by Marias Industries. The steel-processing operations generated spent pickle liquor (K062), which was emptied by a closed system of underground 12-inch pipes, directly from the former pickling tanks into an Open Concrete Tank (SWMU 2) located approximately 400 feet west of the Marias Industries property line (IEPA, 1982b). The spent pickle liquor (K062) was also sprayed on the Landfill (SWMU 1) for rodent control.

The Open Concrete Tank (SWMU 2) is divided into two compartments: a settling compartment and an evaporation compartment. During Triem Steel's operations, the spent pickle

liquor (K062) and surface runoff water were discharged into the settling compartment. As solids (sludge) settled, the oily residue floating on the surface was skimmed back with a rubber flap skimming device. The sludge and oil were collected for disposal (IEPA, 1982a). No documentation was found regarding sludge and oil being sent offsite for disposal. Overflow would run into the evaporation pond (IEPA, 1982a). Manufacturing operations continued until Triem Steel filed for bankruptcy in 1983 (IEPA, 1985a).

Prior to using the Open Concrete Tank (SWMU 2), Triem discharged industrial wastewater to the Former Lagoon (SWMU 3). The Former Lagoon (SWMU 3) was located approximately 400 feet west of the facility, below grade of the facility in the same area as the Open Concrete Tank (SWMU 2). The Former Lagoon (SWMU 3) operated for 33 years before the Open Concrete Tank (SWMU 2) began operations in 1981. The Former Lagoon (SWMU 3) is the area surrounding the Open Concrete Tank (SWMU 2).

BVWST personnel discovered conflicting documentation about the ownership of the 80 acres that includes the Marias Industries facility. First, according to IEPA files, North American Enterprises, Inc., purchased the 80 acres from the secured assets of Triem Steel in August 1983 (IEPA, 1985a). However, other documents state the National Acceptance Corporation acquired the 80 acres from the secured assets of Triem Steel in 1983 (WCC, 1991). Second, an IEPA document states the landfill portion of the 80 acres was transferred to Bloom Township on January 1, 1985 (IEPA, 1985a). This conflicts with documents that state the Weiss-Ernst Partnership acquired the 80 acres from the National Acceptance Corporation on August 18, 1983, and then on December 28, 1983, donated most of the 80 acres, excluding the 11.56 acres of the southeastern part of the property, to Bloom Township (WCC, 1991).

A.B.G.M., Inc., acquired the property from Bloom Township on March 13, 1986 (WCC, 1991). JM2, Inc., acquired the property from A.B.G.M., Inc., on January 5, 1988 (WCC, 1991). During the VSI, BVWST personnel were given documentation by Marias Industries representatives that states Four M Steel, a structural steel fabricator, obtained a lease with an option to acquire the former Triem Steel property in 1984. The lessor/owner at the time was represented in the lease as Chicago Heights Properties, Inc. (Marias Industries, 1992a). No other information was available regarding Chicago Heights Properties, Inc.

In 1984, Four M Steel leased a portion of the former Triem Steel property. Four M Steel fabricated steel and provided storage for steel products, such as coil and bars; its only processing operations were cutting and welding. No hazardous wastes were generated by this facility (IEPA, 1985a). When Four M Steel occupied the site, the company dismantled and cut up all equipment left by Triem Steel and sold it for scrap (IEPA, 1985a). BVWST assumes that the former pickling tanks

were also cut up and sold for scrap because Marias Industries personnel have no knowledge of the tanks. Marias Industries personnel believe Four M Steel went bankrupt sometime between 1989 and 1990.

In 1987, Marias Industries entered into a lease with the option to acquire the 11.56 acres of the Four M Steel site from Weiss-Ernest Partnership, the successor to Chicago Heights Properties, Inc. Marias Industries began its storage and distribution operations at that time. Later in 1987, Marias Industries purchased the 11.56 acres it now occupies (Marias Industries, 1992a).

2.3 WASTE GENERATING PROCESSES

The facility's former SWMUs are identified in Table 1. The facility's current layout, including approximate locations of SWMUs, is shown in Figure 2. The facility's former waste streams are summarized in Table 2.

The primary waste stream generated at the Marias Industries facility is nonhazardous paper trash from the office. Marias Industries receives, stores, and transloads various non-hazardous products; it does not manufacture or produce hazardous waste streams.

Beginning in 1905, when the National Brick Company owned the site, it operated a brick manufacturing facility and excavated clay on 45 acres. The brick manufacturing operation was abandoned around 1920. From about 1929 to 1947, the 45-acre excavated area, which is north and northwest of the Marias Industries property, was used as a garbage dump for approximately 20 surrounding communities. By 1947, about 4 acres of the original 45-acre strip-mining pit were filled with refuse (WCC, 1991). No other information is available about the waste generated by the National Brick Company.

When Triem Steel owned the 80-acre site, which included what is currently Marias Industries, it used the 45 acres as a Landfill (SWMU 1). Between 1947 and 1977, the landfill served a population of roughly 140,000 (WCC, 1991). Most of the pit was filled with municipal waste consisting of garbage, putrescible waste, solid waste, demolition material, combustible material, and paper (WCC, 1991). Wastes from Triem Steel operations included oily waste, sludge, and spent pickle liquor (K062). The spent pickle liquor (K062) was sprayed on the landfill for rodent control. The landfill was capped with a 2-foot layer of clay and closed on May 28, 1977 (WCC, 1991).

Spent pickle liquor (K062) was emptied directly from the former pickling tanks by a closed system (IEPA, 1982a) of underground 12-inch pipes into an Open Concrete Tank (SWMU 2) located

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Landfill	No	Inactive
2	Open Concrete Tank	Yes	Active
3	Former Lagoon	No	Inactive

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

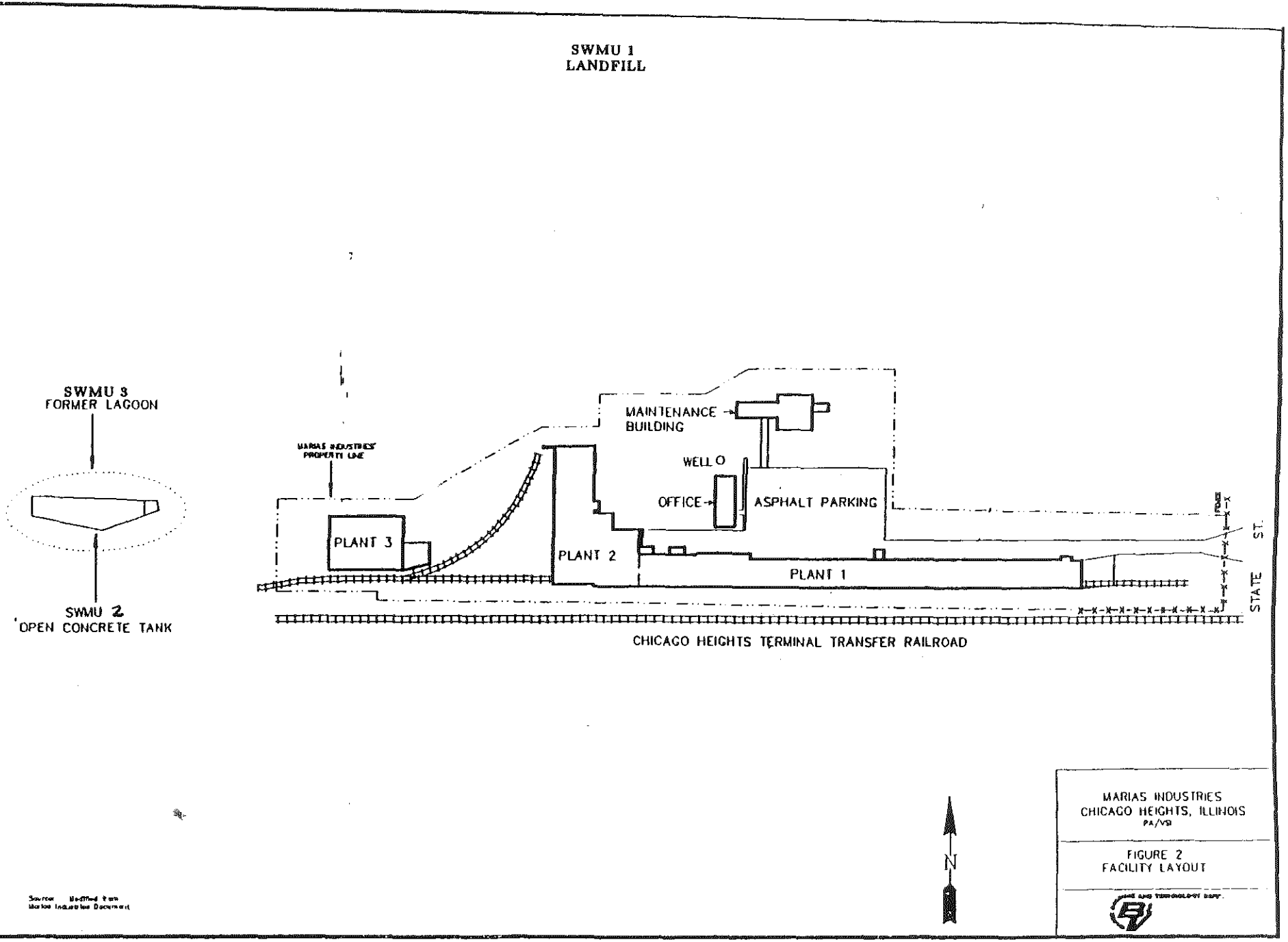
approximately 400 feet west of Marias Industries. The Open Concrete Tank (SWMU 2) also collected the surface runoff water from the onsite storm sewers.

The Open Concrete Tank (SWMU 2) is divided into two compartments: a settling compartment and an evaporation compartment. The settling compartment received a neutralization solution and water used to clean the underground piping and former pickling tanks. Before entering the settling compartment, this waste stream was approximately 90% treated; the remainder was treated in the compartment. All lines where neutralized waste entered the settling compartment are closed. As solids (sludge) settled, the oily residue floating on the surface was skimmed back with a rubber flapskimming device. The sludge and oil were collected for disposal (IEPA, 1982a). No documentation was found of the sludge and oil being sent offsite for disposal. Overflow from the settling compartment would run into the second compartment for evaporation (IEPA, 1982a).

The Open Concrete Tank (SWMU 2) is underground and approximately 50 feet wide and 150 feet long. It has a solid, limestone, bedrock bottom and 12-inch-wide concrete walls. The walls are anchored to the bedrock bottom with 1-inch-thick reinforcing bars. The bedrock bottom is lined with a double application of coal tar epoxy to make it leakproof (Triem Steel, 1980b). A wall separates the two compartments. The settling compartment is approximately 4 to 6 feet deep; the evaporation compartment is approximately 10 feet deep. The Open Concrete Tank (SWMU 2) has been in operation since 1981 (IEPA, 1982a). It was listed in Triem Steel's Part A permit application. No documentation shows this unit has ever been RCRA closed.

For approximately 33 years, before it used the Open Concrete Tank (SWMU 2), Triem Steel discharged the spent pickle liquor (K062) to a Former Lagoon (SWMU 3) (Triem Steel, 1978). No documentation shows the exact location of the Former Lagoon (SWMU 3). However, BVWST personnel assume it is in the same location as the Open Concrete Tank (SWMU 2) because the same piping would have been used to discharge the spent pickle liquor and because there is a hollow depression surrounding the Open Concrete Tank (SWMU 2).

The Open Concrete Tank (SWMU 2) was used to collect nonhazardous surface runoff water from the Four M Steel facility. Four M Steel fabricated steel and provided storage for steel products. Its only processing operations were cutting and welding, which generated no hazardous wastes (IEPA, 1985a).



Source: Modified from Marias Industries Document

TABLE 2
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Spent Pickle Liquor/K062	Steel pickling	SWMUs 1, 2, and 3
Municipal and Industrial Waste/[b]	Landfilling	SWMU 1
Wastewater/NA	Neutralization and cleaning of underground pickling tank piping	SWMUs 2 and 3
Waste Oil/NA	Cleaning underground pickling tank piping	SWMU 2
Surface Water Runoff/NA	Surface runoff	SWMU 2

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] Wastes could have been either hazardous or nonhazardous

The Open Concrete Tank (SWMU 2) is currently used to collect the nonhazardous surface water runoff from the site, according to Marias Industries personnel (Marias Industries, 1992b). Sanitary waste discharges to a septic tank located onsite.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Marias Industries facility and preceding facilities.

Marias Industries has no documented releases.

The National Brick Company, during its ownership of the property, had no documented releases.

For approximately 33 years, Triem Steel discharged spent pickle liquor (K062) to the Former Lagoon (SWMU 3). This Former Lagoon (SWMU 3) has no history of being sampled.

IEPA noted the open concrete tank overflowing during an inspection when Four M Steel was operating at the facility (IEPA, 1985a).

Triem Steel had been discharging spent pickle liquor (K062) to the Former Lagoon (SWMU 3) for approximately 33 years (Triem Steel, 1978). This Former Lagoon (SWMU 3) has no history of being sampled.

The Landfill (SWMU 1) operated as a municipal landfill from 1929 to 1977. The Landfill (SWMU 1) managed municipal wastes consisting of garbage, putrescible waste, demolition material, combustible material, and paper. From 1947 to 1977 Triem Steel operated the Landfill (SWMU 1) and disposed of industrial wastes consisting of oily waste, sludge, and spent pickle liquor which was sprayed on the Landfill for rodent control.

2.5 REGULATORY HISTORY

Marias Industries has never submitted a Notification of Hazardous Waste Activity to EPA. It does not have any hazardous waste activity and the facility has never submitted a RCRA Part A permit application. Marias Industries is not subject to RCRA compliance regulations.

Marias Industries is not required to have operating air permits. The facility does not have a history of air permit compliance problems or odor complaints from area residents.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. Sanitary waste is discharged to a septic tank located onsite. The facility discharges the surface runoff water to the Open Concrete Tank (SWMU 2) located approximately 400 feet west of Marias Industries. The owner of the land west of Marias Industries is unknown.

Triem Steel submitted a Notification of Hazardous Waste Activity form to EPA on June 25, 1980 (Triem Steel, 1980a). Triem Steel submitted a RCRA Part A permit application on November 13, 1980 (Triem Steel, 1980b).

Triem Steel capped the Landfill (SWMU 1) with a 2-foot layer of clay and closed it on May 28, 1977 (IEPA, 1985a).

According to its RCRA Part A permit application, Triem Steel was classified as a generator and a treatment/storage/disposal (TSD) facility. The facility generated spent pickle liquor (K062) from its steel finishing operations. The spent pickle liquor (K062) was treated in an Open Concrete Tank (T01), (SWMU 2) which handled 1,500 gallons of the spent pickle liquor (K062) per day. The estimated annual quantity of this waste (K062) was 3,000,000 pounds (Triem Steel, 1980b). Triem Steel's annual report states that for the year ending December 31, 1980, the facility treated 456,000 pounds of spent pickle liquor (K062) from steel finishing operations (Triem Steel, 1981).

The exact date of the construction of the Open Concrete Tank (SWMU 2) was not documented. For approximately 33 years, before construction of the Open Concrete Tank (SWMU 2), Triem Steel was discharging the spent pickle liquor (K062) and surface runoff water to the Former Lagoon (SWMU 3). BVWST assumes this lagoon was located where the Open Concrete Tank (SWMU 2) is today. The area containing the Open Concrete Tank (SWMU 2) is approximately 400 feet west of Marias Industries; the owner of this property is unknown.

In 1981, EPA determined that Triem Steel met the requirements of a "totally enclosed" treatment facility and, therefore, was exempt from the 40 CFR 265 regulations for TSD facilities (IEPA, 1982a).

Triem Steel remained a generator of hazardous waste and was subject to the appropriate regulations because the definition of hazardous waste [40 CFR 261.3 (c)(2); Title 35 Subtitle G, Part 721.103 (c)] states that a sludge generated from the treatment of a listed hazardous waste remains a

hazardous waste. The facility could have petitioned for delisting of the sludge if the sludge was shown not to be hazardous by characteristic (IEPA, 1982a).

EPA received a chemical analysis of the sludge from the Open Concrete Tank (SWMU 2) on October 20, 1982 (IEPA, 1982b). The extraction procedure (EP) toxicity for both chromium and lead was below the standards (Attachment F). To be exempt from the regulations, IEPA recommended that Triem Steel petition to delist the sludge as a hazardous waste (IEPA, 1982b). No information about Triem Steel petitioning to delist the sludge was found.

Triem Steel was not required to have operating air permits and no documentation showed odor complaints from area residents. Also, no documentation showed that the Open Concrete Tank (SWMU 2) was RCRA closed.

No documentation indicated that Four M Steel submitted a Notification of Hazardous Waste Activity or a RCRA Part A permit application to EPA.

Four M Steel was not subject to RCRA regulations. No records show that Four M Steel was required to have operating air permits and the facility does not have a history of odor complaints from area residents. The facility was not required to have an NPDES permit.

During a 1985 inspection, the Open Concrete Tank (SWMU 2) was found overflowing with water. It was impossible to determine whether any sludge remained (IEPA, 1985a). BVWST recommends that records be checked to determine whether sludge was sent offsite for disposal. If there are no records, then the tank should be checked for characteristic waste. No documentation states that the sludge, which was the result of treatment of the spent pickle liquor (K062), was sent offsite for disposal.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater near the Marias Industries facility.

2.6.1 Climate

The climate in Cook County is classified as humid continental type (USDA, 1979). The annual average daily maximum temperature is 58.7 degrees Fahrenheit (° F) and the annual average daily minimum temperature is 39.7° F (NWB, 1991). The average precipitation from 1958 to 1990

was 33.3 inches per year, and the greatest 24-hour rainfall was 9.3 inches in August 1987 (NWB, 1991). The overall wind direction varies seasonally with an average wind speed of 10.3 mph.

2.6.2 Flood Plain and Surface Water

The Marias Industries facility is not included in a 100-year-flood plain (FEMA, 1981). The nearest surface-water body, Deer Creek, is located approximately one mile east of the facility and is used for recreational purposes. This surface-water body discharges to Thorn Creek, which ultimately discharges to the Calumet River.

The surface-water runoff flows to storm sewer drains located onsite. This water discharges to the publicly owned treatment works (POTW). This discharge is not under an NPDES permit.

2.6.3 Geology and Soils

The soil types over much of Cook County have not been mapped in detail by the U.S. Department of Agriculture because of obscuring urban land use. However, a Department of Agriculture report contains a regional soil map that classifies the soil near Marias Industries as nearly level and poorly drained as a result of clay and silt deposits in a glacial lake (USDA, 1979).

The sediment and rock occurrence expected at the site is an unknown thickness of unconsolidated sediments originating from Pleistocene glacial action (ponded-water clays, tills, and outwash) overlying bedrock composed of sedimentary rock units of Paleozoic age. No site-specific information is available about the character of either the unconsolidated materials or the bedrock. However, Berg and Kempton have used data from the Illinois State Geological Survey's extensive collection of well logs to prepare a series of maps that generally indicate the probable occurrence of sediments and/or bedrock within the interval from the surface to a depth of 50 feet. For the area around Marias Industries, Berg and Kempton indicate a probability of more than 20 feet of predominantly silty, clayey till over Silurian and Devonian rock, mainly dolomite. The bedrock surface is expected to be between 20 and 50 feet below grade (Berg and Kempton, 1988).

2.6.4 Ground Water

In northeastern Illinois, ground water for public and industrial use is or has been obtained from four water-producing zones within the geologic succession. The first zone is the ground water occurring within the unconsolidated Pleistocene sediments. The second zone is an interval of shallow bedrock units that are generally in contact with the Pleistocene sediments. The third and fourth zones are two deeper intervals of water-producing rock units. Almost all wells producing municipal or industrial water within the Greater Chicago area pump from one or both of the deep bedrock aquifer zones (Hughes and others, 1966).

The shallow bedrock zone in northeastern Illinois underlies the glacial sediments and is mainly comprised of Silurian dolomite. The upper boundary of this zone is the erosional surface of the bedrock, which is commonly obscured by glacial sediments. The lower boundary is the upper Ordovician Maquoketa Shale. Water produced from the dolomite is obtained from fractures and solution openings (Hughes and others, 1966). The shallow bedrock aquifer zone receives some recharge locally from precipitation (Hughes and others, 1966).

The deep bedrock aquifer zones include the Cambrian-Ordovician aquifer and the Mt. Simon aquifer (Hughes and others, 1966). The Cambrian-Ordovician aquifer contains two major zones: the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian-Ordovician zone is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely used where water requirements are less than 200 gallons per minute (gpm). This unit has a hydraulic conductivity between 9 and 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq.ft. Recharge to the deep bedrock aquifers is mostly from west and north of the six-county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system.

The Mt. Simon aquifer is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement rock. The average hydraulic conductivity of this aquifer is 16 gpd/sq.ft. (Hughes and others, 1966) and recharge is largely from the outcrop region of Cambrian rocks in south-central Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Marias Industries facility occupies 11.56 acres in an industrial area in Chicago Heights, Illinois. Chicago Heights has a population of about 33,000 (BC, 1991).

The Marias Industries facility is bordered on the north by the Triem Steel Landfill (SWMU 1); on the west by railroad tracks and vacant land containing Open Concrete Tank (SWMU 2) and the probable site of the Former Lagoon (SWMU 3); on the south by railroad tracks; and on the east, across State Street, by Trinity Steel. The nearest school, Mt. Carmel, is located about one-half mile north of the facility. Facility access is controlled by an alarm system for all buildings. Fencing runs along the eastern border. A gate on the eastern side of the facility secures the State Street entrance.

The nearest surface-water body, Deer Creek, is located approximately one mile east of the facility and is used for recreational purposes.

The Marias Industries facility uses bottled water for drinking water.

Ground water is used only as a washup and sanitary water supply at the facility. The nearest drinking-water well is located at 2729 Jackson Avenue, South Chicago Heights, Illinois, approximately 3,000 feet south of Marias Industries (IEPA, 1985b). The ground-water well is tested annually. Results of the last test are given in Attachment D (NTLI, 1991).

Sensitive environments are not located onsite. The nearest wetland area, which is approximately 18 acres, is located approximately 400 feet south of the facility (NWI, 1983).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations. Figure 2 shows the SWMU locations.

SWMU 1	**Landfill**
Unit Description:	This unit occupied 45 acres, outdoors on the northern part of the Triem facility. From 1905 to 1920 the National Brick Company excavated 45 acres of clay for making brick. From 1929 to 1947 this unit operated as a municipal waste landfill for approximately 20 surrounding communities. From 1947 to 1977 the landfill also managed industrial wastes generated by Triem Steel. In addition, Triem Steel sprayed spent pickle liquor on the landfill for rodent control. In 1977, this unit was capped with a two-foot layer of clay.
Date of Startup:	This unit began operations in 1929.
Date of Closure:	This unit was capped with a two-foot clay layer on May 28, 1977.
Wastes Managed:	This unit managed municipal wastes consisting of garbage, putrescible waste, demolition material, combustible material, and paper. This unit also managed industrial waste consisting of oily waste, sludge, and spent pickle liquor. Triem Steel also sprayed spent pickle liquor on the landfill for rodent control.
Release Controls:	This unit has been capped, and there is no record of any release controls for the unit.
History of Documented Releases:	Municipal and industrial wastes were landfilled at the unit from 1929 to 1977. No controls were located on the landfill.
Observations:	The unit had been covered with a two-foot clay cap. BVWST observed a rusted drum and various construction debris at the unit. (see Photograph Nos. 3 and 4).

SWMU 2	**Open Concrete Tank**
Unit Description:	This unit is located approximately 400 feet west of the facility. It is underground with 12-inch concrete walls anchored to the bedrock and no bottom. The concrete walls have a double application of coal tar epoxy. This unit is approximately 150 feet long by 50 feet wide. It is broken into two compartments. The first compartment is 4 to 6 feet deep and the second compartment is about 10 feet deep. This unit is presently used to collect runoff water from the Marias Industries facility.
Date of Startup:	This unit began operations around 1981.
Date of Closure:	This unit is active.
Wastes Managed:	This unit managed sludge from treatment of spent pickle liquor (K062) from Triem Steel. This unit presently receives nonhazardous runoff water from the Marias Industries facility. There is no documentation stating sludge from this unit was taken off-site for disposal.
Release Controls:	This unit has a solid limestone bedrock bottom and 12-inch wide concrete walls anchored with 1-inch reinforcing bars to the bedrock. The concrete walls are lined with a double application of coal tar epoxy.
History of Documented Releases:	In 1985, this unit was overflowing with runoff water.
Observations:	The 4- to 6-foot deep compartment of the unit contained greenish-brown water. The 10-foot deep compartment contained vegetation on the bottom. A fence around the top of this unit was falling apart (see Photograph No. 1).

SWMU 3	**Former Lagoon**
Unit Description:	This unit was where spent pickle liquor (K062) and runoff water drained. This unit was a naturally depressed land area approximately 400 feet west of the facility. The Former Lagoon was located in the approximate area of the Open Concrete Tank (SWMU 2). The depressed area is currently used as a retention pond for the facility.
Date of Startup:	This unit began operations around 1947.
Date of Closure:	This unit has not been used since around 1981.
Wastes Managed:	This unit managed spent pickle liquor (K062) and runoff water.
Release Controls:	There is no record of any release controls for the unit.
History of Documented Releases:	Spent pickle liquor was drained into the lagoon.
Observations:	BVWST observed the unit is currently used as a retention pond for the facility (see Photograph No. 2).

4.0 AREA OF CONCERN

BVWST identified no AOCs during the PA/VSI.

5.0 RECOMMENDATIONS

The PA/VSI identified three SWMUs at the Marias Industries facility. Background information on the facility's location, operations, waste generation and management, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU information is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are BVWST's recommendations.

SWMU 1 **Landfill**

Conclusions:

This unit was used as a municipal waste landfill from 1929 until 1947 and as a municipal and industrial landfill from 1947 to 1977. Wastes disposed of consisted of garbage putrescible waste, demolition mater, combustible material, paper, oily waste, and sludge. Triem Steel also sprayed spent pickle liquor (K062) on the landfill for rodent control. There were no release controls for this unit. The potential for release to environmental media is summarized below.

Ground Water: The potential for a release to ground water is high. The unit managed liquid and semi-solid wastes from 1929 to 1977 with no release controls, ground water is located approximately 20 feet bgs.

Surface Water: The potential for a release is moderate to high. Contaminated ground water may have discharged to Deer Creek approximately one mile east of the facility.

Air: The potential for release to air is moderate to high. Decaying wastes in the landfill would have created methane gas. No information was available if vents were located at the landfill.

On-site soils: The potential for a release to on-site soils is high. Numerous municipal and industrial wastes, including liquids and semi-solids, were landfilled.

Recommendations:

BVWST recommends EPA conduct further investigations to determine the owners of the property where SWMU 1 is located.

SWMU 2 **Open Concrete Tank**

Conclusions: This unit may still contain sludge. This unit does not have a concrete floor; the bedrock is used as the floor. The potential for release to environmental media is summarized below.

Ground Water: The potential for release to ground water is moderate. This unit does not have a concrete floor and may contain sludge. The sludge may have leaked through the bottom to this media. When this unit overflows, the liquid may leach through the ground to this media.

Surface Water: The potential for release is moderate. The sludge, if still present in this unit, may be carried over the side walls.

Air: The potential for release is low. Sludge, if in this unit, will have little effect on this media.

On-site soils: The potential for release to on-site soils is moderate. The sludge, if present in this unit, may be transported to surrounding soils.

Recommendations: BVWST recommends that more research be done on the history of this unit. BVWST also recommends additional investigation to determine the ownership of the property where this unit is located.

SWMU 3 **Former Lagoon**

Conclusions: This unit was an area of land below the grade and west of the facility. The potential for release to environmental media is summarized below.

The potential for release to ground water, surface water, and on-site soils is moderate to high. There were no release controls for the spent pickle liquor (K062). This material could have easily leaked to ground water, surface water, and on-site soils.

Air: The potential for release is low. The unit managed non-volatile waste.

Recommendations:

BVWST recommends that more research be done to determine the owner of the property west of Marias Industries. BVWST has copies of EPA and IEPA files on this property. Available documentation presents a conflicting history of ownership of this property. During the VSI, Marias Industries personnel were unable to give information on the ownership of property west of their facility.

BVWST recommends no further action for the Marias Industries facility. In addition to determining ownership of the property west of the Marias Industries facility, BVWST recommends records be thoroughly investigated to determine if sludge and oil, from the open concrete tank, were sent offsite for disposal. If sludge and oil were not sent offsite for disposal, the bottom of the open concrete tank should be sampled to determine if characteristic waste constituents are present.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Landfill	1929 to May 28, 1977	Various municipal and industrial wastes were buried and no release controls were present on the unit.	Conduct additional investigation to determine the current owner(s) of this property.
2. Open Concrete Tank	1981 to present	The unit does not have a concrete floor to contain sludge; in 1985 the unit was overflowing with runoff water.	Conduct additional investigation to determine current owner(s) of this property.
3. Former Lagoon	1947 to 1981	Spent pickle liquor was disposed of in this unit. There were no release controls on this unit.	Conduct additional investigation to determine the current owner(s) of this property.

REFERENCES

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Marias Industries, Inc. (Marias Industries), 1992a. Memorandum Given to Mitchell Balek and Tim Moody During VSI, May 25.

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Triem Steel, 1981. Hazardous Waste Report, March 5.

United States Department of Agriculture (USDA), 1979. Soil Survey of DuPage and Cook Counties, Illinois.

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Woodward-Clyde Consultants (WCC), 1991. Preliminary Site Report for Triem Steel Landfill, January 15.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 001 744 572

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Marias Industries, Inc.	2710 State Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Chicago Heights	IL	60411	Cook	031	07
09 COORDINATES: LATITUDE 41° 29' 00.0"	**LONGITUDE** 087° 38' 15.0"				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take Route 90/94 to Route 94 South, to Route 394 South. Take Route 394 South to Lincoln Highway west; turn left (south) on State Street. Continue on State Street to Marias Industries located at 2710 State Street.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Daniel Marias	2710 State Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Chicago Heights	IL	60411	(708) 757-4944
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Paul Marias	2710 State Street		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Chicago Heights	IL	60411	(708) 757-4944

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 06 / 25 / 80 *(MONTH DAY YEAR)* ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___ / ___ / ___ *(MONTH DAY YEAR)* ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 5/29/92 ☐ NO

BY *(Check all that apply)*

☐ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☒ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: Subcontractor to EPA *(Specify)*

CONTRACTOR NAME(S): B&V Waste Science and Technology Corp.

02 SITE STATUS *(Check one)*

☒ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION

1905 *(BEGINNING YEAR)* Present *(ENDING YEAR)* ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Sludge from treatment of spent pickle liquor (K062)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Spent pickle liquor was managed in a lagoon and an open concrete tank. Neither unit had containment. A 45-acre landfill managed municipal and industrial waste.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA Region 5			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Mitch Balek, Tim Moody		BVWST	(312) 346-3775	05 / 29 / 92 *(MONTH DAY YEAR)*

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	IL D 001 744 572

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*
- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☐ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*
- TON _____
- CUBIC YARDS _____
- NO. OF DRUMS _____

03 WASTE CHARACTERISTICS *(Check all that apply)*
- ■ A. TOXIC
- ■ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. INFLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			Sludge from K062 treatment
OLW	OILY WASTE	Unknown		Oily wastes were disposed of onsite
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	Municipal waste				
	Industrial waste				

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Illinois Environmental Protection Agency (IEPA) files

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	IL D 001 744 572

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ■ A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
■ POTENTIAL □ ALLEGED

An area of 45 acres on the site was used as a municipal landfill from 1929 until 1977. The landfill also managed industrial wastes from 1947 until 1977. This waste may have contaminated ground water under this site.

01 ■ B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
■ POTENTIAL □ ALLEGED

Contaminated ground water may reach surface water 1 mile away.

01 ■ C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
■ POTENTIAL □ ALLEGED

An area of 45 acres on the site was used as a municipal landfill from 1929 until 1977. Methane gas may have formed from the decomposition of wastes.

01 □ D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

None reported

01 □ E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

None reported

01 ■ F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: 45 *(Acres)*
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

An area of 45 acres on the site was used as a municipal landfill from 1929 until 1977. The landfill also managed industrial wastes from 1947 until 1977.

01 □ G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

Nearest drinking water well is located 3,000 feet south of the faciity. This well is tested annually.

01 □ H. WORKER EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: 30
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

Workers may contact contaminated soil.

01 □ I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____
02 □ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
□ POTENTIAL □ ALLEGED

None reported

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: IL	02 SITE NUMBER: ILD 001 744 572

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☒ ALLEGED
04 NARRATIVE DESCRIPTION

Spent pickle liquor (K062) was sprayed on the landfill for rodent control.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE:_____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 30 — 04 NARRATIVE DESCRIPTION

Spent pickle liquor (K062) was managed in a former lagoon and an open concrete tank. Neither of these units had containment.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: 30

IV. COMMENTS

There is contradictory information regarding the current owner(s) of the property. Recommend additional information regarding the current owner.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Illinois Environmental Protection Agency (IEPA) files

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Marias Industries
Chicago Heights
ILD 001 744 572

Date:	May 29, 1992
Facility Representatives:	Daniel J. Marias, Executive Vice President Paul Marias, Plant Manager
Inspection Team:	Mitchell P. Balek, B&V Waste Science and Technology Corp. Timothy J. Moody, B&V Waste Science and Technology Corp.
Weather Conditions:	Sunny, temperature about 75°F
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed past and present operations, solid wastes generated, and release history at the Marias Industries facility. Most information was exchanged on a question-and-answer basis. Marias Industries representatives provided the inspection team with copies of documents requested. The walk-through portion of the VSI began at 9:45 a.m. It was determined that the facility contained no SWMUs or AOCs. Facility operations were shown to the inspection team. The tour concluded at 11:45 a.m., after which the inspection team held an exit meeting with the facility representatives. The VSI was completed and the inspection team left the facility at 12:15 p.m.

Photograph No. 1 Location: SWMUs 2 and 3
Orientation: West Date: 7/24/92
Description: Open concrete tank and former lagoon. The small compartment (evaporation compartment) has a fence around it. The large compartment (settling compartment) has fencing falling apart around it.

Photograph No. 2 Location: SWMUs 2 and 3
Orientation: West Date: 7/24/92
Description: The area of the former lagoon surrounds the open concrete tank. It slopes to the bottom of this former lagoon. This photograph shows the open concrete tank (SWMU 2) inside and below grade of the top grade of this unit. It is believed by BVWST personnel that the whole area below the top of the grade was occupied by the former lagoon.

Photograph No. 3 Location: SWMU 1
Orientation: North Date: 7/24/92
Description: Landfill. Note the rusted drum and construction debris in the foreground.

Photograph No. 4 Location: SWMU 1
Orientation: Southwest Date: 7/24/92
Description: This shows the Marias facility as seen from the Landfill.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

CONTENTS

PAGE NO.	REFERENCE	DATE

Tyrem Steel
Chicago Heights, IL
Visual site inspection

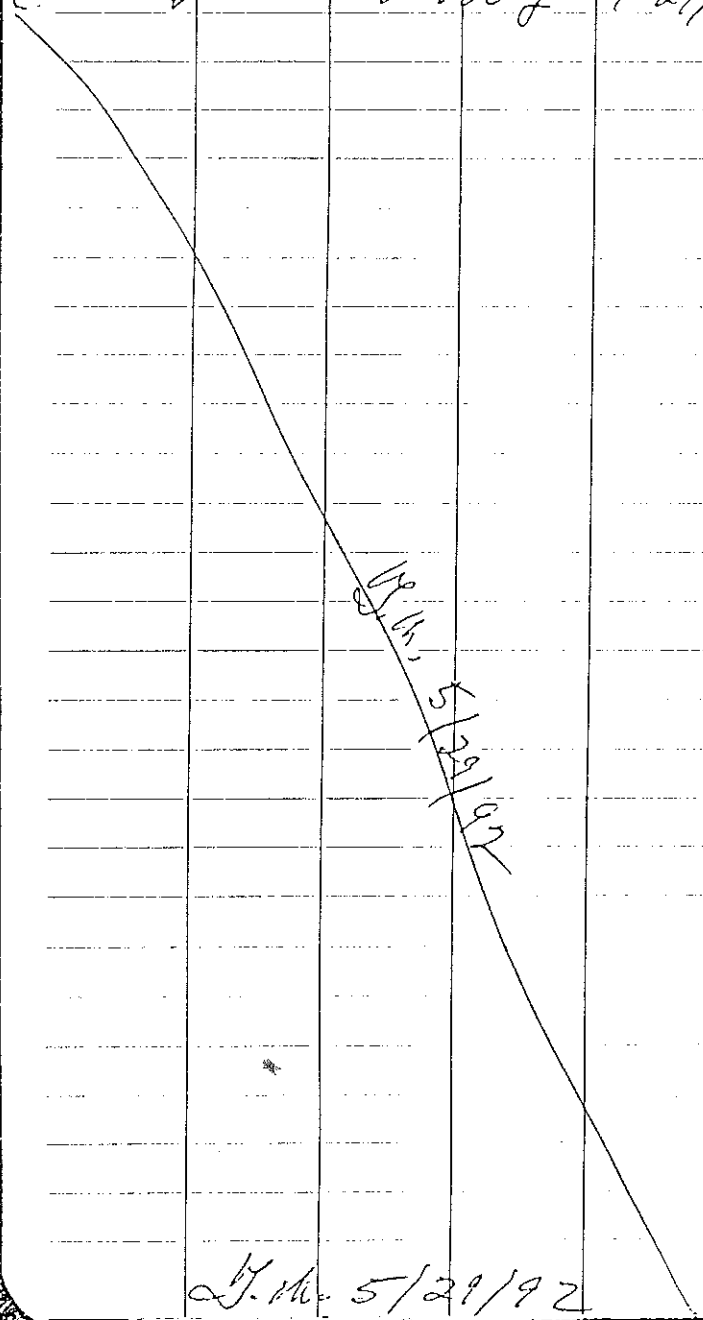
29 May 1992

Mitch Baleh
Tim Moody

B+V Waste Science & Technology Corp.
101 W. Wacker Dr., #1100
Chicago, IL 60606
(312) 346-3775

2

Dr — Moody 5/29/92



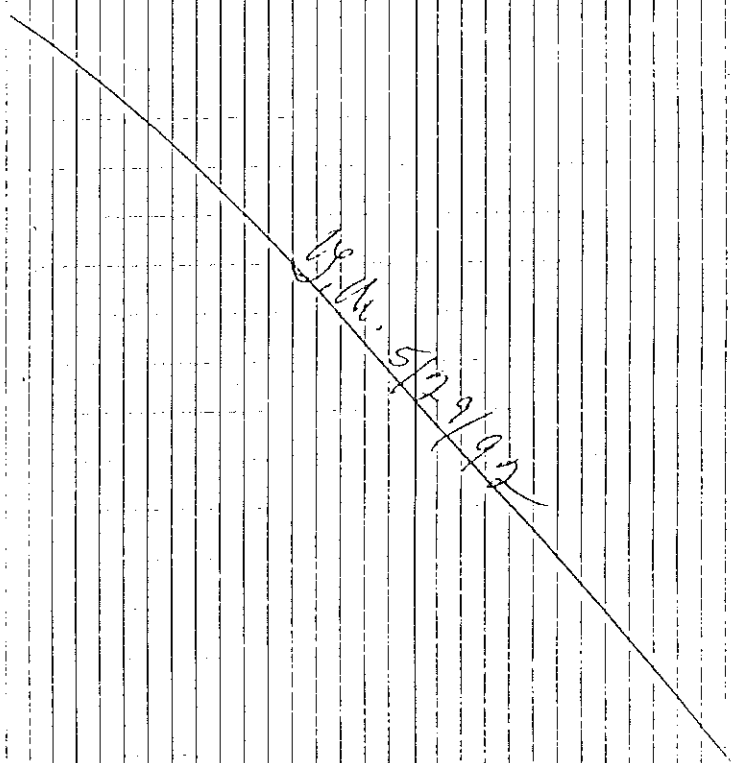
Dr. M. 5/29/92

3

Dr — Moody 5/29/92

Mitch Baker & Gen Moody arrived at the Marias Industries at 10:30 a.m. May 29, 1992.

The weather is sunny, about 75°F.



Dr. M. 5/29/92

Tim Moody 5/29/92 4

T.M. 5/29/92

T.M. 5/29/92

Tim Moody 5/29/92 5

- Spec. V.P.
- Plant Manager

Paul Macias

No knowledge of previous owner operating a warehouse of steel, lumber & fluidin products — steel beams, coils, rods, pipe, etc — lumber products plywood, timbers, topsoil, bark, dry wall, etc.

(2) Also transload products — get rail cars from Orange County & unload by a mobile crane & put onto truck for local delivery

(3) Steel fabricating

T.M. 5/29/92

Tim Moody 5/29/92 6

T.M. 5/29/92

T.M. 5/29/92

Tim Moody 5/29/92 7

Don't generate any waste

Fencing at all T.M. borders south, east property lines fenced

Landfill is north of the facility

Paul has done a little contact with these things — water testing came back clean → has copy of recent well test

Drink only bottled water at facility — well water only used for washing

came 2 years ago to Chicago Illinois

T.M. 5/29/92

Wm. Moody 5/29/92 8

W.M. 5/29/92

W.M. 5/29/92

Wm. Moody 5/29/92 9

Nearest residence is about ½ mile north - residence on north side of 26th St, which is [illegible] along north [illegible] Unincorp in Cook County

South is Goodey - Henrichsen + a steel pipe mfctre.

Across State St. is Trinity Steel

West - railroad tracks + vacant land

Fencing is

Sch: Mon - Fri days
6 - 2:30 7 - 3:30

East side is only access

W.M. 5/29/92

Kim Moody 5/29/92 10

D.M. 5/29/92

D.M. 5/29/92

D.M. Moody 5/29/92 11

Security: Alarm sys for all buildings

Weekends - trailer blocks west point of access

No knowledge of sensitive environments

Potential - pond west of property

Runoff: Sewer septic sys onsite - pump out of tank - discharge to west

Materials go out the same way they're received

Deal with 100 different companies

D.M. 5/29/92

J.i. — Moody 5/29/92 12

J.M. 5/29/92

J.M. 5/29/92

J.i. — Moody 5/29/92 13

Demolished & filled
a [illegible] @ [illegible] of
plant site & it collected
water runoff

Maras Industries Inc.
owns the 12 acres

There are no waste
streams — only daily
garbage

Begin tour at 11:30

About 20,000 [illegible]
of material [illegible]

10% steel [illegible]
30% [illegible]

J.M. 5/29/92

Li Moody 5/29/92 14

Bill 5/29/92

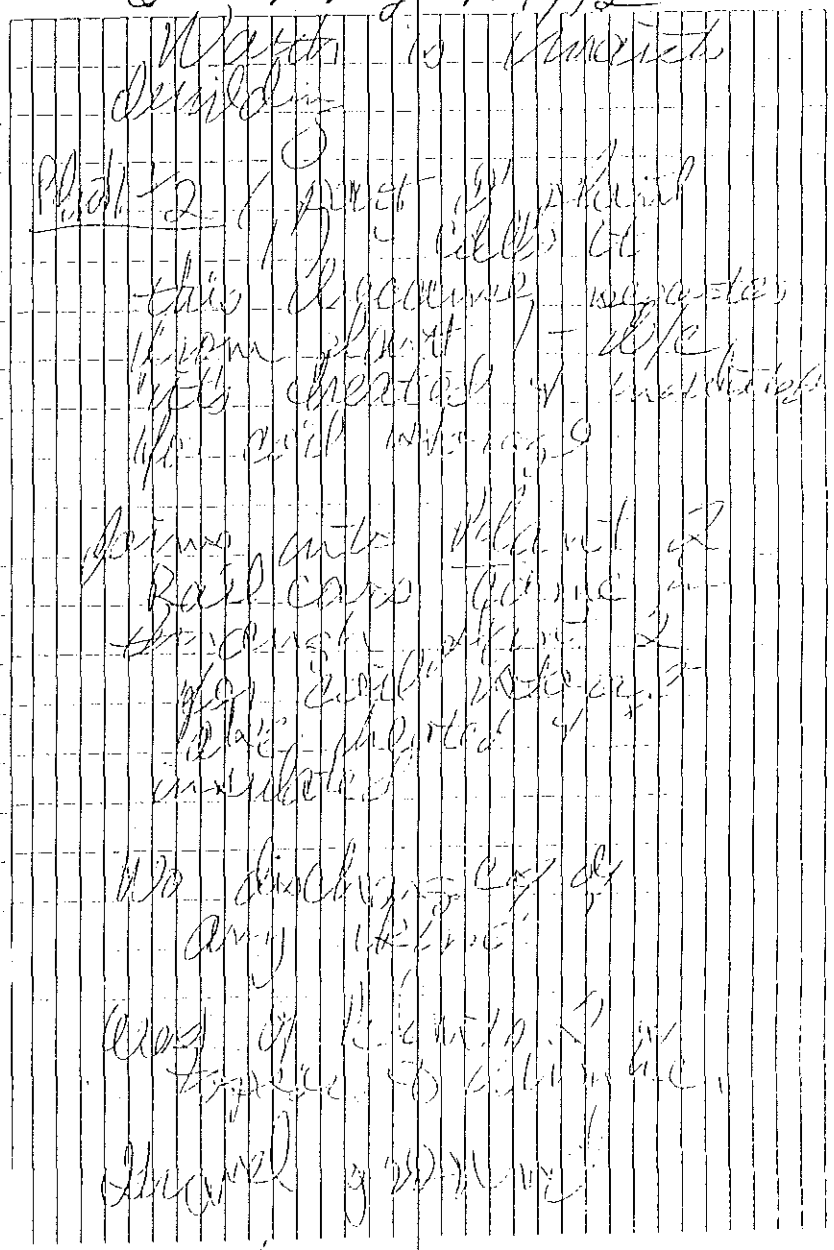
L.M. 5/29/92

Li Moody 5/29/92 15

L.M. 5/29/92

Dr. Moody 5/29/92 16

Dr. Moody 5/29/92 17



D.M. 5/29/92

D.M. 5/29/92

Vic Moody 5/29/92

V.M. 5/29/92

V.M. 5/29/92

Vic Moody 5/29/92

V.M. 5/29/92

20

Y. M. Moody 5/29/92

B.M. 5/29/92

Y. M. 5/29/92

21

Y. M. Moody 5/29/92

B.M. 5/29/92

22

Fri — Moody 5/29/92

D.M. 5/29/92

D.M. 5/29/92

23

Fri — Moody 5/29/92

Main Doc. F.I. 2
[illegible] 5

Berming already existed

8 facilities in U.S.

o Inspection completed at 12:00 — resume talks (in office)

They were very angry when Army personnel went to their [illegible] [illegible] [illegible]

Tested water 3–4 times from well

Know of no closures on their 12 acres

D.M. 5/29/92

Y — Moody 5/29/92 24

~~DM 5/29/92~~

DM. 5/29/92

10:15 Y — Moody 5/29/92 25

Proceed w/ inspection of landfill.

Border of landfill & woods distinguished by end of gravel [illegible] immediately [illegible] [illegible]

A [illegible] [illegible] [illegible] 2 feet [illegible] [illegible]

DM. 5/29/92

D. Moody 5/29/92

D. Moody 5/29/92

T.M. 5/29/92

D. Moody 5/29/92

T.M. 5/29/92

Dim Moody 5/29/92

28

D.M. 5/29/92

D.M. 5/29/92

Dim Moody 5/29/92

29

D.M. 5/28/92

Tim Moody 5/29/92

Tim Moody 5/29/92

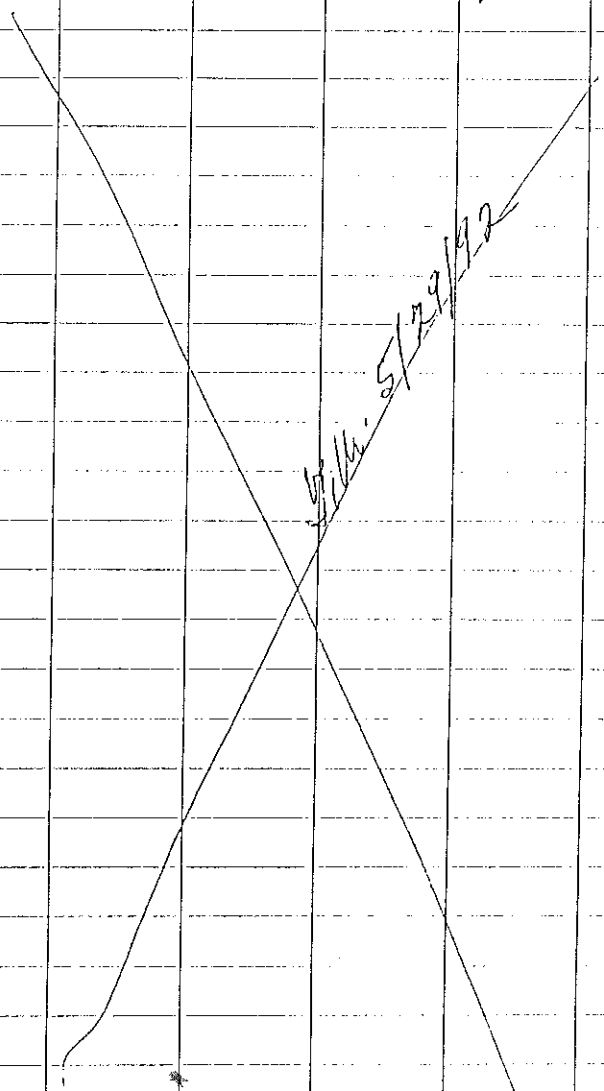
Tim Moody 5/29/92

Tim Moody 5/29/92

Trees along left boundary

Tim Moody 5/29/92

D. Moody 5/29/92 32



D. Moody 5/29/92

D. Moody 5/29/92 33

D. Moody 5/29/92

K— Moody 5/29/92

K— Moody 5/29/92

D.M. 5/29/92

K— Moody 5/29/92

D.M. 5/29/92

K. Moody 5/29/92 36

K. Moody 5/29/92

K. M. 5/29/92

K. Moody 5/29/92 37

K. M. 5/29/92

38

K. Moody 5/29/92

K. M. 5/29/92

K. M. 5/29/92

39

K. Moody 5/29/92

Photo 21 -

Photo 22 -

Photo 23 -

K. M.

K. M. 5/29/92

ATTACHMENT D

DRINKING WATER ANALYSIS RESULTS

DATE COLLECTED	DATE RECEIVED	DATE COMPLETED	SAMPLE CODE
12/11/91	12/13/91	12/20/91	9360363

CUSTOMER ADDRESS

MARIAS INDUSTRIES
2710 STATE ST.
P.O. BOX 1331
CHICAGO HTS., IL

DEALER ADDRESS

GREAT AMERICAN WATER SYS
14036 LINDER AVE.
MIDLOTHIAN, IL 60445-

WATERCHECK / NATIONAL TESTING LABORATORIES INC
6151 Wilson Mills Road
Cleveland, OH 44143
(216) 449-2525

DRINKING WATER ANALYSIS RESULTS

NOTE: "*" indicates that the MCL (Maximum Contaminant Level) has been exceeded, or in the case of pH is either too high OR too low.
"ND" indicates that none of this contaminant has been detected at or above our detection level.
"**" Result may be invalid due to lack of "Time Collected" or because the sample has exceeded the 30-hour time frame.
"BD" Bacteria destroyed due to lack of collection information or because the sample has exceeded the 48-hour time frame.
TNTC-Too Numerous To Count NBS-No Bacteria Submitted

Analysis performed	MCL (mg/l)	Detection Level	Level Detected
Microbiological:			
Total coliform (organism/100ml)	0	0.0	ND**
Inorganic chemicals - metals:			
Arsenic	0.05	0.010	ND
Barium	1.0	0.30	ND
Cadmium	0.01	0.002	ND
Chromium	0.05	0.004	ND
Copper	1.0	0.004	0.27
Iron	0.3	0.020	9.3*
Lead	0.05	0.002	ND
Manganese	0.05	0.004	0.030
Mercury	0.002	0.0002	ND
Nickel	0.15	0.02	ND
Selenium	0.01	0.002	ND
Silver	0.05	0.002	ND
Sodium	---	1.0	100
Zinc	5.0	0.004	ND
Inorganic chemicals - other, and physical factors:			
Alkalinity (Total as CaCO3)	---	10.0	820
Chloride	250	10.0	104
Fluoride	4.0	0.50	ND
Nitrate as N	10	0.5	ND
Nitrite as N	---	0.5	ND
Sulfate	250	10.0	316*
Hardness (suggested limit = 100)		10.0	950*
pH (Standard Units)	6.5-8.5	---	6.6

Total Dissolved Solids	500	20.0	1937*
Turbidity (Turbidity Units)	1.0	0.1	175.0*
Organic chemicals - trihalomethanes:			
Bromoform	---	0.004	ND
Bromodichloromethane	---	0.002	ND
Chloroform	---	0.002	ND
Dibromochloromethane	---	0.004	ND
Total THMs (sum of four above)	0.1	0.002	ND
Organic chemicals - volatiles:			
Benzene	0.005	0.001	ND
Vinyl Chloride	0.002	0.001	ND
Carbon Tetrachloride	0.005	0.001	ND
1,2-Dichloroethane	0.005	0.001	ND

page 2. Sample code: 9360363

Analysis performed	MCL (mg/l)	Detection Level	Level Detected
Trichloroethylene	0.005	0.001	ND
1,4-Dichlorobenzene	0.075	0.001	ND
1,1-Dichloroethylene	0.007	0.001	ND
1,1,1,-Trichloroethane	0.20	0.001	ND
Bromobenzene	---	0.002	ND
Bromomethane	---	0.002	ND
Chlorobenzene	---	0.001	ND
Chloroethane	---	0.002	0.008
Chloroethylvinyl ether	---	0.002	ND
Chloromethane	---	0.002	ND
2-Chlorotoluene	---	0.001	ND
4-Chlorotoluene	---	0.001	ND
Dibromochloropropane (DBCP)	---	0.001	ND
Dibromomethane	---	0.002	ND
1,2-Dichlorobenzene	---	0.001	ND
1,3-Dichlorobenzene	---	0.001	ND
Dichlorodifluoromethane	---	0.002	ND
1,1-Dichloroethane	---	0.002	ND
Trans-1,2-Dichloroethylene	---	0.002	ND
cis-1,2-Dichloroethylene	---	0.002	ND
Dichloromethane	---	0.002	ND
1,2-Dichloropropane	---	0.002	ND
trans-1,3-Dichloropropene	---	0.002	ND
cis-1,3-Dichloropropene	---	0.002	ND
2,2-Dichloropropane	---	0.002	ND
1,1-Dichloropropene	---	0.002	ND
1,3-Dichloropropane	---	0.002	ND
Ethylbenzene	---	0.001	ND
Ethylenedibromide (EDB)	---	0.001	ND
Styrene	---	0.001	ND
1,1,1,2-Tetrachloroethane	---	0.002	ND
1,1,2,2-Tetrachloroethane	---	0.002	ND
Tetrachloroethylene (PCE)	---	0.002	ND
Trichlorobenzene(s)	---	0.002	ND
1,1,2-Trichloroethane	---	0.002	ND
Trichlorofluoromethane	---	0.002	ND
1,2,3-Trichloropropane	---	0.002	ND
Toluene	---	0.001	ND
Xylene	---	0.001	ND
Organic chemicals - pesticides, herbicides & PCBs			
Alachlor	---	0.005	ND
Atrazine	---	0.050	ND
Chlordane	0.02	0.01	ND
Aldrin	---	0.005	ND
Dichloran	---	0.005	ND
Dieldren	---	0.002	ND
Endrin	0.0002	0.0002	ND
Heptachlor	0.01	0.002	ND
Heptachlor Epoxide	---	0.002	ND
Hexachlorobenzene	0.02	0.005	ND
Hexachloropentadiene	---	0.005	ND
Lindane	0.004	0.004	ND
Methoxychlor	0.1	0.05	ND
PCBs	0.008	0.004	ND
Pentachloronitrobenzene	---	0.005	ND
Silvex 2,4,5-TP	0.01	0.005	ND

Simazine	---	0.050	ND
Toxaphene	0.005	0.005	ND
Trifluralin	---	0.005	ND
2,4-D	0.1	0.010	ND

I certify that the analyses performed for this report are accurate, and that the laboratory tests were conducted by methods approved by the U.S. Environmental Protection Agency or variations of these EPA methods. These test results are intended to be used for informational purposes only and may not be used for regulatory compliance.

PRESIDENT, NATIONAL TESTING LABORATORIES, INC.

REV. 2-91

ATTACHMENT E

LETTER TO MARIAS INDUSTRIES FROM IEPA

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0310450005 -- Cook County
Chicago Heights/Triem Steel and Processing, Inc.
Superfund/Compliance

October 21, 1988

Mr. Charles J. Marias, President
Marias Industries, Inc.
2710 State Street
P.O. Box 1331
Chicago Heights, IL 60411

Dear Mr. Marias:

The Triem Steel and Processing, Inc. site included on the September 23, 1988 update of the Agency's State Remedial Action Priorities List (SRAPL) is not delineated as such by a proper legal description. For the purposes of determining a valid Hazard Ranking System (HRS) score, it has not been necessary to further define the site. However, from our review of the Preliminary Assessment, the Site Inspection Report and the HRS package, only a portion of the former Triem property, that being the approximately forty-five (45) acre landfilled area (and any associated waste disposal areas), appears to constitute a significant environmental hazard. The approximately 11.558 acres property occupied by Marias Industries at 2710 State Street in Chicago Heights, Illinois does not appear to involve the landfill.

Therefore, the property you have described, to wit:

> "That part of the North Half of the Southeast Quarter of Section 28, Township 35 North, Range 14 East of the Third Principal Meridian, in Cook County, Illinois described as follows: Beginning at a point 34 feet North of the South line of the North Half of said Southeast Quarter and 50 feet West of the East line of said Southeast Quarter; thence due North 180 feet on a line 50 feet West of and parallel to last said East line; thence North 89° 50' 33" West 660 feet on a line parallel to the South line of said North Half of the Southeast Quarter; thence due North 267 feet; thence North 89° 50' 33" West 285 feet; thence South 55° 39' 27" West 97 feet; thence North 89° 50' 33" West 200 feet; thence due South 65 feet; thence North 89° 50' 33" West 112 feet; thence South 60° 01' 27" West 280.98 feet; thence North 89° 50' 33" West 265 feet; thence South 0°, 09' 27" West 170 feet; thence South 89° 50' 33" East 196 feet; thence South 0° 09' 27" West 16 feet; thence South 89° 50' 33" East 1650 feet to the place of beginning, all in Cook County, Illinois."

is exempted from the property hereafter included on the SRAPL as the Triem Steel and Processing, Inc. site. Nor does the Agency anticipate any cleanup actions at the approximately 11.558 acres Marias property.

If you have any questions or if this letter does not offer you the proper representation you have requested, please feel free to contact Robert O'Hara of my staff through this office or at 217/782-3101.

Sincerely,

Monte M. Nienkerk

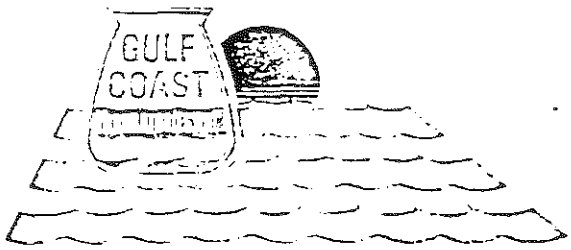
Monte M. Nienkerk, Manager
State Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

MMN:REO/mls/3237j/83-84

cc: Division File
Regional File
Bob O'Hara
Don Gimbel
Bob Rosen

ATTACHMENT F

CHEMICAL ANALYSIS ON SLUDGE



GULF COAST LABORATORIES, INC.
2417 Bond St., Park Forest South, Illinois 60466
Phones (312) 534-5200 (219) 865-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Triem Steel
Box 578
Chicago Heights, Illinois 60411

TTN: Mr. Fredrickson

DATE: October 18, 1982

RE: Sludge Sample
Sample Date: 10/05/82
GCL# 32572

PARAMETERS	E.P. TOXICITY LEACHATE	
Total Chromium	< 0.5	mg/l
Total Lead	< 0.5	mg/l

RECEIVED
OCT 20'82

Donald Lipple

Analyst

Date 10/18/82